

Mr. Chairman and Members of the Board of Fisheries,

My name is Alfredo Abou Eid and along with my son Rame Abou Eid we are writing to you, the members of the board, to strongly oppose proposal 109 which deals with what district Jacks Point will be in.

The Jacks Pt fishing area is currently part of Chignik's Central District where it is legal gear to use longer and deeper seines than are allowed in Chignik Lagoon where only shorter and shallower seines may be used. Jack's Point has been in the Central District for many years and moving it into the Chignik Bay District means we can no longer use our bigger outside seine there. That disadvantages us because we only fish outside the lagoon and don't even have a small lagoon seine.

As it is now fishermen may use either a bigger outside seine or a smaller Lagoon seine at Jacks Point. No one is excluded. We regularly fish Jack's Point right along side smaller boats any time they want to come out to Jacks Point to fish when we are there. Basically, the only boats affected by this proposal is us and occasionally a few other outside boats and that effect is very negative.

Jacks Point gives outside fishing boats a place to fish when the weather is not the greatest and an optional place to fish when many areas are closed. Not to mention, if they wish to fish their shallower, shorter nets at Jacks Pt, they can without having to change nets and they have been fishing Jack's Point there for years with their beach seines for years and there is no restriction that says that they cannot use there beach seine in this spot if they wish to fish it, and if they choose not to stay, they can easily go back to the lagoon without net swapping.

Considering how many outside boats there are fishing with outside nets during the month of June in Chignik, changing this area doesn't make any sense and puts even more restrictions on the outside fleet; especially when they propose to close the western district in the month of June to help the chum and Chinook escapement for Chignik and the AYK fishery. With this June restriction and taking jacks point away will cause hardship and fewer open areas for purse seine fisherman. Also, we have had discussions with other fishermen in Chignik that where not part of the AC committee that submitted this proposal that also oppose this proposal.

We would like you to leave it the way it is without making any changes to this area as that benefits both purse seine and lagoon seine fishermen.

Thank you for taking the time to read and consider this

Alfredo Abou Eid
Chignik lagoon

Mr chairman and Members of the Board,

My name is Alfredo Abou Eid and along with my son Rame Abou Eid we are writing to you, the members of the board, to strongly reject proposal 110 that would shallow up Chignik's purse seine depth from 375 meshes to 325 meshes to promote conservation of chinook and chum. We might be willing to live with that but ONLY if Area M has the same limits. However, proposal 110 does not require Area M to have the same limitations, and so we must strongly object and oppose Proposal 110. Further, if the Board rules on Proposal 110 before addressing the shallowing of Area M seines then we respectfully request that if the board passes proposal 110 then we strongly request that a sunset clause be incorporated so that the Board would automatically revisit this in three years. This would also allow the Board to return to the seine depth of 375 meshes when the chum and chinook runs become strong again.

Thank you for taking the time to read and consider this

Alfredo Abou Eid
Chignik lagoon



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

On behalf of the Agdaagux Tribe of King Cove, we submit this testimony to express our strong support for responsible, adaptive fisheries management that sustains both Alaska's fisheries and the coastal communities who have depended on them for generations.

King Cove is a small, remote, and resilient community, but it is also one that is struggling. Over the years, fish processing plants have moved out of our community, eliminating jobs and economic stability that once anchored our local economy. Today, our community relies more heavily than ever on access to nearby fisheries not only for income, but for food security, cultural continuity, and survival. For King Cove, the fishery is not supplemental; it is foundational.

Our people have lived with and stewarded these waters since time immemorial. Traditional knowledge, passed down through generations, has taught us how to fish sustainably, how to read the weather and the water, and how to respect the balance between harvest and conservation. This knowledge is not theoretical, it is lived, practiced, and proven. It is inseparable from who we are as a people. Any fisheries policy that fails to recognize these cultural ties risks erasing not just access, but identity.

Further restrictions on fishing areas that are already under immense economic pressure will have a crippling effect on our community and our Tribal members. When regulations limit access without providing realistic alternatives, they do not simply protect resources, they compound hardship. They threaten livelihoods, force families to leave their home, and weaken the social fabric of an already vulnerable region. Conservation should not come at the cost of community collapse.

For these reasons, the Agdaagux Tribe of King Cove supports the following proposals: 107, 113, 114, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, and 154.

We oppose the following proposals:

108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 136, 140, 141, 143, 148, and 152.

Ideally, we urge the Board to maintain the status quo and continue to support the fisherman adaptive management plan adopted and supported by this Board in 2023. That plan reflects collaboration, flexibility, and a recognition that fishermen are not the enemy of conservation, but essential partners in it. Adaptive management allows for responsiveness to real-world conditions



and ensures that sustainability is achieved without sacrificing the people who depend on these fisheries.

We ask the Board to remember that behind every proposal number are real communities, real families, and real histories. King Cove's fishermen and Tribal members have long demonstrated responsible stewardship of these fisheries and deserve management decisions that reflect that record. Our people are strong, but strength alone cannot withstand policies that overlook lived realities.

Please stand with us. Support management approaches that honor traditional knowledge, protect fisheries, and keep coastal communities alive. Empower the people who have cared for these waters for generations to continue doing so. When communities like King Cove are supported, Alaska's fisheries and Alaska itself are stronger.

Thank you for your time, your consideration, and your service to the people of King Cove.

Respectfully submitted,

Etta Kuzakin
President, Agdaagux Tribe of King Cove



February 3, 2026

Alaska Board of Fisheries
 PO Box 115526
 Juneau, AK 99811-5526
 Email dfg.bof.comments@alaska.gov

RE: Comments by the Aleut International Association for Alaska Peninsula, Aleutians, & Chignik Finfish Meeting, February 2026

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

Thank you for the opportunity to provide public comment during the Alaska Peninsula, Aleutian Islands, and Chignik finfish meeting.

Aleut International Association offers this comment in support of the continued and meaningful inclusion of Aleut communities and their Indigenous Knowledge, Traditional Knowledge, and Local Knowledge (IK/TK/LK) in fisheries management decisions affecting the Aleut people of the Aleutians.

Aleut International Association was formed in 1998 to address the environmental and cultural concerns of the extended Aleut family whose well-being has been connected to the rich resources of the Bering Sea for millennia. Our mission is to promote the continuity of Aleut culture while protecting the resources needed to sustain it. The rich resources of the Bering Sea and North Pacific Ocean have sustained our Unangan communities and people for thousands of years. The Unangaḡ people have always lived in close relationship with salmon and the marine environment as our lives have always depended on the ocean. This knowledge is not abstract or historical as it is living, place-based, and continuously informed by direct observation across generations. It reflects an understanding of fish run timing, ocean conditions, habitat change, and species behavior that cannot be fully captured by short-term datasets alone.

Indigenous and local fishermen, seafood plant workers, Elders, and our community leaders observe changes in salmon abundance, condition, and migration routes year after year. They see how climate variability, ocean warming, predation, and freshwater conditions affect salmon survival long before the fish reach commercial or subsistence fisheries. This knowledge is essential context for interpreting scientific data and for understanding why salmon returns vary so widely across regions and river systems.

THE ALEUT INTERNATIONAL ASSOCIATION, INC.

Permanent Participant of the Arctic Council

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Importantly, Traditional Knowledge does not stand in opposition to western science, rather, it complements it. The most effective fisheries management occurs when empirical data, genetics, test fisheries, and long-term Indigenous and local observations are considered together. When one source of knowledge is elevated at the expense of others, management risks becoming incomplete and disconnected from on-the-ground realities.

Across the Eastern Aleutian region, fishing communities have demonstrated a strong commitment to conservation through adaptive management, voluntary stand-downs, and collaboration with the Alaska Department of Fish and Game. These actions reflect both scientific understanding and deeply rooted cultural values of stewardship, restraint, and responsibility to future generations; which those values that are embedded in Indigenous and local knowledge systems live.

As the Board considers proposals that could significantly affect fishing opportunity, community stability, and conservation outcomes, I respectfully urge you to ensure that Indigenous, Traditional, and Local Knowledge are not treated as secondary or anecdotal. The perspectives of the people from the Aleutian region deserve weight equal to other forms of evidence, particularly in regions where people's livelihoods, cultures, and identities are inseparable from salmon.

Sustainable fisheries management must be grounded in flexibility, humility, and a willingness to listen to those who live with the consequences of these decisions every day. Incorporating the best available science as well as the IK/TK/LK strengthens the Board's ability to make informed, balanced decisions that protect salmon while sustaining our coastal communities and economies that depend on them.

Thank you for your time and consideration.

Respectfully,

Dr. Liza Mack

Board Member, Aleut International Association

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With Spirit and Strength

January 30, 2026

Alaska Board of Fisheries

Submitted via: <https://survey123.arcgis.com/share/5b712469da654e119701e0a95b6d3594>

RE: In opposition to Proposals 127, 128, 129, 130, 131, 132, 133, and 136

Chair Carlson-Van Dort and Members of the Board,

The Aleutian Pribilof Islands Association (APIA) submits this comment consistent with our mission:

- To promote self-sufficiency and independence of the Unangan peoples by advocacy, training, technical assistance, and economic enhancement;
- To assist in meeting the health, safety, and well-being of each Unangax̂ community;
- To promote, strengthen, and ensure the unity of the Unangan; and
- To strengthen and preserve Unangax̂ cultural heritage.

For Unangax̂ communities across the Aleutian and Pribilof Islands, fishing is not a side industry—it is a cornerstone that makes community life possible. It supports family income, small businesses, and the local tax base that funds public services, including schools. Our region has already experienced school closures and outmigration. Further destabilizing the fisheries economy will accelerate those impacts and make it harder for Unangax̂ people to remain in our ancestral homelands and pass on our cultural heritage.

APIA recognizes the serious salmon declines facing the Arctic–Yukon–Kuskokwim (AYK) region, and we share the goal of strong salmon returns across Alaska. AYK refers broadly to salmon-producing systems in the Arctic, Yukon, and Kuskokwim river basins. But conservation action must be tied to evidence and proven tools—not assumptions that shift harm onto one region without delivering real biological benefit elsewhere.

APIA Board Position on Proposals

APIA opposes proposals 127, 128, 129, 130, 131, 132, 133, and 136 relating to 5 AAC 09.365 (South Unimak and Shumagin Islands June Salmon Management Plan). These proposals are closely related and would repeal or substantially rewrite the current management plan and replace it with severe

reductions in June fishing time that would effectively eliminate the June purse seine fishery as it operates today.

Why APIA Opposes These Proposals

1) The record does not support treating Area M as the main lever to restore AYK runs.

Genetic stock identification and harvest-rate analyses referenced in the Area M Seiners Association submission do not support the claim that the June Area M fishery is a dominant driver of AYK declines. “Coastal Western Alaska” (CWAK) is a broad stock grouping—spanning multiple Western Alaska systems—and it is not a single river system that can be “fixed” by eliminating time in one fishery.

2) Observed differences among Western Alaska systems do not align with a simple cause-and-effect narrative.

The record reflects variability in performance among systems in Western Alaska under the same Area M June framework. That pattern is inconsistent with the assertion that sharply restricting Area M will predictably produce recovery across AYK.

3) Major stressors affecting AYK salmon operate far beyond Area M.

Peer-reviewed research cited in the record identifies climate-driven freshwater and marine stressors—warming rivers, altered chemistry, disease pressures, and changing ocean conditions—that affect survival across life stages. Those drivers cannot be meaningfully addressed by stripping time from the Area M June fishery.

4) Area M has already produced measurable conservation results through adaptive, in-season management.

A key fact before the Board is that fishermen and managers have developed and implemented an adaptive management approach that has reduced chum harvest while keeping the fishery workable. This tool relies on coordination, compliance, and real-time adjustments—exactly the kind of responsive, science-informed management the Board routinely endorses. Sweeping time cuts risk, weakening the very mechanism that is already delivering conservation outcomes.

5) These proposals threaten Unangax̂ communities disproportionately.

When a fishing opportunity is removed without a clear conservation benefit, the harm is immediate and local: reduced earnings, fewer jobs, strain on small businesses, and less capacity to support public services funded by fisheries-related revenue. That directly threatens long-term community stability and the ability of Unangax̂ families to live and remain rooted in our region.

6) The Board should rely on verified records and enforceable facts.

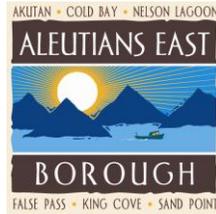
APIA urges the Board to remain anchored in official reporting, monitoring, and enforcement-backed accountability. If additional verification is needed, the answer is targeted monitoring and oversight—not sweeping reductions that punish compliant fishermen and communities based on unsubstantiated allegations.

APIA respectfully urges the Board to reject Proposals 127, 128, 129, 130, 131, 132, 133, and 136 and to defend management approaches that are evidence-based, adaptive, and already producing measurable conservation results. Alaska can pursue salmon recovery without sacrificing one region's communities for outcomes the record does not support. Please contact Environment & Safety Program Administrator Karen Pletnikoff at karenp@apiai.org or (907)276-2700 with any questions.

Respectfully submitted,



Dimitri Philemonof, President/CEO



February 3, 2026

Alaska Board of Fisheries
 Marit Carlson-Van Dort, Chair
 Via email: dfg.bof.comments@alaska.gov

RE: Aleutians East Borough Cooperative Salmon Research Efforts

Chair Carlson-Van Dort and Board Members,

The Aleutians East Borough is a municipality that represents the coastal communities of King Cove, Sand Point, False Pass, Nelson Lagoon, Akutan and Cold Bay. The Borough and its communities are entirely fisheries-based economies; commercial fishing provides employment for residents, subsistence for families, and fish tax revenue to support community services. Although the Borough was established to support schools and infrastructure projects, we are also tasked with overseeing the health of our natural resources, especially the fisheries we are so reliant on.

Our local fishermen are often the first to identify an issue or change in the fisheries and are usually the most qualified to ask the right questions and help solve problems. They intimately understand fishing gear, local geography, timing and behavior of different species, and most importantly, what will be an effective and/or feasible solution to a problem. However, the high cost of living and operating in our region results in very narrow profit margins, so fishermen cannot afford to fund programs like CDQ or dedicated research foundations that tackle these types of projects. With ever-shrinking state and federal budgets, fishery managers also cannot afford to fund research that is not core to managing and executing fisheries. In response, the Borough has taken a lead in facilitating cooperative projects to address applied research questions that would otherwise go unfunded.

There is a perception that restricting fishing time, areas, and gear are the only measures within our control to affect conservation change. To a certain degree this is true, as these tools are readily available and usually don't require significant additional resources for ADF&G to implement. Unfortunately, these types of restrictions are a blunt tool, often implemented without empirical evidence to support rationale leading to arbitrary changes in management. There are potentially countless other measures within our control that could support conservation goals, but we often lack the resources to explore them. Cooperative research can leverage non-traditional resources (e.g. fishing vessels, existing equipment, local knowledge, etc.) to answer policy-relevant questions, that can complement existing management and even inform better regulation.

Salmon Tagging Pilot Study

In response to stakeholder concerns over the conservation of chum and Chinook salmon, the AEB in collaboration with ADF&G staff and the University of Alaska Fairbanks Seitz Lab, conducted a pilot

study to satellite tag salmon during the June test fishery in the South Alaska Peninsula. Satellite tags are an extremely valuable tool in understanding movement and behavior of fish because they collect high resolution data which can be transmitted over satellites and do not rely on recapture. Depth, temperature and light data can be used to reconstruct horizontal and vertical movement pathways, infer causes of mortality, and understand swimming behavior and habitat occupancy. The primary objectives of this study were to verify that chum salmon can successfully carry satellite tags, and to use satellite tag data to assess survivorship of chum and Chinook salmon caught and then released from a seine vessel under standard operating conditions.

Due to the complexity of project objectives and satellite tag data, only preliminary results were available by the comment deadline. Attached is the completion report for Aquatic Resource Permit #CF-25-101 which provides a brief overview of the project and descriptive summary of tagging results and conclusions. Preliminary conclusions suggest that 1) chum salmon can be successfully carry satellite tags for long distances; 2) seine caught chum and Chinook salmon survive to varying degrees after being released; 3) salmon shark predation was a major source of mortality; 4) chum salmon spend a majority of time in the upper water column and sporadically make deep dives.

We are in the process of finalizing a manuscript for peer-review that will formally summarize tag results. If possible, we will make a preprint available after submission to the publisher. I would like to acknowledge the Alaska Department of Fish and Game for their in-kind support of staff time and the UAF Seitz Lab for providing their tremendous expertise in salmon tagging. We look forward to continuing these cooperative research efforts and providing an update on the results of policy-relevant objectives.

Sincerely,



Charlotte Levy, Fishery Analyst
Natural Resources Department

ADF&G ARP #CF-25-101 Completion Report (Submitted 2/3/2026)

Project Title: Using pop-up satellite archival tags to study post-release survival of chum salmon (*Oncorhynchus keta*) released from seine vessels in the South Peninsula June fishery

Project Background and Purpose

Salmon fisheries are critically important to the culture, health and economic stability of many coastal Alaskan communities. Western Alaskan communities have expressed serious concern over the declines in some chum stocks in the AYK Region. While there is general agreement that the cause of declines is likely due to the changing climate and warming ocean conditions, some stakeholders assert every fish is important to the health of these stocks and are urging managers to take more action that is within their control. Unfortunately, Genetic Stock Identification (GSI) can only delineate stock structure for broad reporting groups, therefore any chum assigned to the Coastal Western Alaska (CWAK) summer reporting group could be bound for a vast swath of systems ranging from Bristol Bay to Norton Sound¹. This makes it difficult to assess the true impact of harvesting CWAK chum, and many stakeholders are urging managers to take additional action for conservation.

Fishermen in the South Peninsula salmon fishery recognize that a portion of their harvest is likely bound for systems along Western Alaska, though stock composition is variable each year and recent genetic studies show catch is predominantly of Asian hatchery origin. The fleet is comprised of mostly locally owned and operated fishermen, homeported in the coastal communities Sand Point, King Cove, False Pass and Nelson Lagoon that have a long history of cultural and economic reliance on salmon^{2,3}. Fishermen in this region are interested in finding management tools that balance achieving conservation goals without overly restricting fishing opportunities that may not result in meaningful conservation benefits.

One tool used in state managed fisheries is the retention and/or non-retention of certain species to achieve various goals, either through regulation or Emergency Order. While this tool is successfully used for several species of Pacific salmon, less is known about the post-release survival of chum salmon (*Oncorhynchus keta*), specifically when released from commercial seine vessels. One of the primary goals of this pilot is not only to understand post-release survival, but also the feasibility of an “optimized” non-retention program. In this context, “optimized” refers to the tradeoff between ideal release conditions for survival and disruption to fishing operations, recognizing that a mandatory non-retention of all chum would be logistically challenging (particularly for large hauls) and unnecessary to achieve the objective of conserving non-Asia only chum.

Results from the few similar studies that exist suggest the physiological indicators that determine survival are scale loss, duration of air exposure, crowding severity during pursing, and fish maturity and sex^{4,5}. To better understand the potential for survival and factors that influence survival under a nonretention program, we proposed using pop-up satellite archival tags (PSATs) on chum salmon caught and released from commercial seine vessels.

PSATs that are deployed on fish can collect high resolution data on depth, temperature, light intensity, and tilt and acceleration allowing researchers to understand movement pathways, swimming behavior, habitat occupancy and mortality⁶⁻¹³. Tags are scheduled to release from the fish on a preprogrammed date, then float to the surface where data are transmitted to the Argos satellite network. This makes PSATs uniquely

suited for studying mortality, as fish do not need to be recaptured to access data. For example, PSATs have been used on Pacific halibut incidentally caught then released in the Bering Sea trawl fishery to investigate discard mortality rates under various catch handling scenarios and identify factors for survival^{10,14}. Similarly, Seitz et al. (2019)¹¹ used the same tags to infer causes of mortality on large immature Chinook salmon during their late marine phase and found predation to be a significant cause of mortality. However, there is a dearth of information available on chum satellite tagging, as there is only one prior study that successfully released a satellite tag on a single chum salmon¹⁵.

In addition to satellite tagging, we leveraged this opportunity to test whether fishermen can visually distinguish chum salmon from different reporting groups. Many experienced fishermen believe they tell the difference between Asian and non-Asian origin chum. Asian hatchery chums are anecdotally said to be smaller and skinnier with a distinct “torpedo” shape, and generally less healthy looking with severe scale loss. If visual identification were possible, this could improve optimized nonretention allowing for faster sorting (and release) by visually targeting certain fish. To test this theory, we proposed having fishermen sort chum into Asian and non-Asian groups, then subsampling each group for genetic tissue to use for individual assignment analysis.

Therefore, we used PSATs and biological sampling to investigate the following questions:

1. Do chum salmon that have been sorted and released from purse seine vessels under normal catch handling practices survive, what are the sources of mortality, and what factors (if any) can be used as predictors of survival?
2. Can PSATs be used to understand movement rates, pathways and behavior of chum salmon?
3. Can Asian vs. non-Asian chum be visually differentiated by fishermen using morphological characteristics (e.g. torpedo body shape, shedding scales, etc.) and contextual clues (e.g. timing, location, etc.)?

Methods

This pilot study deployed a total of 27 PSATs on chum salmon, and opportunistically deployed three PSATs on Chinook salmon. Tags were released from purse seine vessels contracted by Alaska Department of Fish and Game to conduct the test fishery occurring June 8-10, near Popof Head in Statistical Area 282-11 of the Shumagin Islands section. Each day, nine tags were released across three sets ($n = 3$; per set). Three scientists participated in field work: Charlotte Levy (AEB, Lead), Sabrina Garcia (ADF&G, co-Lead), and Ana Vinson (ADF&G).

Tag Specifications and Tagging Methods

This study used MiniPAT tags built by Wildlife Computers, Inc. (Redmond, WA); detailed tag specifications can be found on the manufacturer's website (<https://wildlifecomputers.com/>). The MiniPAT tag collects high-resolution depth, temperature, and light-level data and is equipped with a tri-axial accelerometer that records acceleration, tilt and knockdown to characterize swimming behavior. Tags were preprogrammed to record data once per second (1 Hz) and scheduled to pop-up after 25-30 days.

As is typical for satellite tagging studies, there is limited information available on tagging effects which precluded us from including a true “control” treatment. Instead, a “reference” fish was handled in a way that the project team thought was the closest to a control, in this instance, to account for a potential gear

effect. The two lead scientists took turns tagging as fish came aboard, while the third scientist was collecting biological samples and recording data. Four sets were made on the first day, and the first set was used as a practice run-through of the sampling design.

The vessel was directed to use normal fishing and catch handling practices, except for asking crew to sort fish with some care (i.e. don't step on fish or handle using eyes or gills), as is common in nonretention programs. The more experienced crew members were asked to conduct the species sorting. When selecting a fish for tagging, the crew was directed to choose a chum that was at least 24 inches (FL) and did not show any major outward signs of scale loss, trauma, or impairment. Immediately after pursing the net, but before rolling the bag on deck, a crew member or captain would select a "reference" fish directly from the water and transfer it to the tagging table using a dipnet. Then the vessel continued operating as normal, lifting the purse and transferring the remaining catch from the net to the sorting deck. As some crew members sorted, others would select two additional chum for tagging after the reference fish.

Each tagged fish was sampled for length (FL), fin clip for genetics, scale samples for ageing. We ultimately did not collect mucus samples, as there was too much scale shedding and mucus cross contamination. Tagged fish were then released headfirst directly into the water over the railing. Because the sorting process happened very quickly, we ultimately did not use "beginning of sort" and "end of sort" treatments, and instead tagged fish as quickly as crew could identify and sort them with the intention of using total air exposure (i.e. time on deck) as a continuous variable. As such, set-level data were recorded such as tow time, purse time, time on deck, sort time.

Asian vs. non-Asian visual differentiation

After tagging was complete, the crew sorted non-chum species into the hold and began segregating chum into two groups: Asian origin ("Asia") and all other chum ("non-Asia") for biological sampling. For each set, we randomly sampled up to 10 fish per group. In addition to the samples above, we also took a picture of both sides of the fish for morphometrics and did a visual maturity assessment. For genetic samples, a piece of pelvic fin was collected and placed on a Whatman genetic card (WGC). At least one scale sample was collected from the preferred area of the fish following ADFG's *A Basic Guide to Ageing & Identification of Pacific Salmon Scales*, then stored on a scale "gum" card and impressions made using acetate/diacetate cards. Scales collected from non-preferred areas were noted.

Data Analyses

Objectives 1 & 2: Do chum salmon that have been sorted and released from purse seine vessels under normal catch handling practices survive? Can pop-up satellite tags be used to understand movement rates, pathways and behavior of chum salmon?

PSAT time series data were analyzed to determine the fate of tagged animals at the end of the deployment period. A combination of depth, temperature, light intensity, and acceleration metrics are used to determine if a tagged fish was alive at the end of the deployment or if mortality occurred, to infer the cause of mortality. We will estimate survival probabilities using a Kaplan-Meier framework or other suitable analysis, and explore potential covariates that may influence survival (e.g. air exposure, size, etc.). Movement pathways (e.g., daily estimated locations and associated location error) for all tagged fish have been reconstructed with the Wildlife Computers GPE3 geolocation software using transmitted light and depth data. Reconstructed movement paths and PSAT data were used to determine movement rates, spatial patterns, activity levels, and typical depths and temperatures occupied for all tagged fish. High resolution time series data are time-weighted to account for gaps in data transmission.

Objective 3: Can “Alaska” chum salmon be differentiated from Asian hatchery salmon by fishermen using morphological characteristics?

Genetic tissue samples collected from Asian and non-Asian fish were sent to ADF&G Gene Conservation Lab to be processed and analyzed, along with scales for age and associated metadata. The current WASSIP and updated coastwide baseline is capable of Individual Assignment (IA) for chum salmon using five broad-scale reporting groups including Japan, Russia, Western Alaska, Gulf of Alaska and WA/BC. We will use results from IA as the reference to evaluate whether fishermen can visually differentiate between Asian and non-Asian chum salmon. We will compare each fishermen’s visual classification to the genetic assignment and classify each fish as correctly or incorrectly identified. We will summarize overall classification accuracy and evaluate whether fishermen perform better than random expectation using binomial methods. We will also use confusion matrices to describe correct and incorrect identifications of non-Asian and Asian fish separately and to evaluate whether fishermen differ in their ability to identify one group versus the other. We will examine whether fish length influences identification accuracy using regression analyses, including whether size effects differ between non-Asian and Asian fish. Because fish are sampled within fishing sets, days, and crews, we will account for this hierarchical sampling structure in the analyses to ensure appropriate statistical inference.

Preliminary Results

This report is intended to be a high-level overview of the project. We are currently preparing raw tag data for publication which includes a detailed description of methods, to be provided to ADF&G upon completion. Comprehensive results of policy-related objectives will be submitted in a subsequent publication. This report is limited to a descriptive summary of biological collections and satellite tagging results.

Biological Sampling

We collected biological samples from chum salmon (N = 163), which was 90% of our sampling goal. Length of sampled fish ranged from 48-73 cm (FL). Genetic samples are currently stored at the ADF&G Gene Conservation Lab where they will be analyzed. Scales samples were also delivered to ADF&G for age determination, and less than 5% were collected from non-preferred areas (n = 7). Visual gonadal maturity was qualitatively inspected, and an image collected for later comparison of morphology.

Tagging Summary

We released 27 PSATs on chum salmon and opportunistically released 3 PSATs on Chinook salmon (N = 30, Table 1). Tagged fish length ranged from 55 to 71 cm (FL 61.9 ± 4 cm; mean \pm SD) for chum and 67 to 86 cm (FL 79.3 ± 10.7 ; mean \pm SD) for Chinook. We received data from 29 tags, though only 28 tags had sufficient data for geolocation, as one tag had sufficient data to infer mortality but not for geolocation. Of the 29 tags, 4 were physically recovered in a fishery providing full archived datasets and the remaining 25 tags transmitted data via satellites at various resolutions. Of the 29 tags, six survived to the scheduled popup date (n = 5 chum; n = 1 Chinook). The remaining tags popped up early due to capture in a fishery (n = 4), inferred salmon shark predation (n = 15), or for unknown reasons (n = 5). Preliminary geolocation estimates of individual cumulative displacements ranged from 0-1073 km (264 ± 358 km; mean \pm SD) and absolute displacements ranged from 0-695 km (149 ± 197 km; mean \pm SD). The percent of time spent in depths 0-25 m across all individual fish ranged from 54-99%, but this range narrows to 80-93% after the first seven days.

Table 1. Deployment information and summary of descriptive depth data for 27 chum salmon and 3 Chinook salmon tagged near the SE corner of Popof Island in the South Alaska Peninsula. All fish were tagged during the ADF&G Test Fishery that occurred June 8-10, 2025. By species, tags are listed in ascending order of ocean days.

Ptt	Species	Fate*	Fork Length (cm)	Ocean Days ^a	Cumulative	Absolute	Pop Up Latitude	Pop Up Longitude	Mean Depth and Range (m)	Percent Time 0-25 m ^d
					Displacement (km) ^b	Displacement (km) ^c				
32981	Chum	Predation	55	0	0	0	55.15	-160.375	11.3 ± 11.8 (0-34)	76%
32986	Chum	Predation	60	0	2	2	55.125	-160.4	16.8 ± 12.7 (0-58)	73%
33055	Chum	Predation	57	0	0	0	55.25	-160.35	6.2 ± 5.2 (0-32)	99%
33079	Chum	Predation	63	0	2	2	55.125	-160.4	19.7 ± 17.7 (0-56)	56%
33000	Chum	Predation	63	1	11	10	55.1	-160.525	10.6 ± 17.4 (0-136)	88%
33001	Chum	Predation	68	2	17	13	55.1	-160.575	41.3 ± 50.4 (0-208)	54%
33006	Chum	Predation	63	2	13	13	55.1	-160.575	18.4 ± 34.3 (0-176)	80%
32976	Chum	Floater	61	3	22	21	55.125	-160.7	16.2 ± 35.4 (0-188)	90%
32979	Chum	Predation	64	4	26	19	55.05	-160.65	7.9 ± 10.6 (0-86)	93%
33046	Chum	Predation	71	4	19	18	55.1	-160.65	5.5 ± 7 (0-62)	97%
32988	Chum	Predation	59	5	35	15	55.075	-160.6	46.5 ± 48 (0-180)	51%
285364	Chum	Floater	66	5	49	17	55.025	-160.575	4.2 ± 5 (0-40)	98%
33061	Chum	Predation	61	5	95	31	54.85	-160.325	12 ± 21.1 (0-136)	86%
32974	Chum	Floater	65	6	154	145	54.425	-162.275	7.5 ± 12 (0-64)	90%
33007	Chum	Predation	61	6	120	71	54.575	-159.8	40.9 ± 54.5 (0-180)	66%
33009	Chum	Floater	57	6	67	48	54.7	-160.5	8 ± 8.2 (0-70)	96%
33077	Chum	Caught	62	7	109	26	54.9	-160.475	33.3 ± 51 (0-196)	73%
33008	Chum	Caught	63	8	189	149	54.575	-162.5	10.7 ± 19 (0-96)	86%
33005	Chum	Predation	63	17	181	140	54.2	-161.85	13.1 ± 27.1 (0-156)	88%
32973	Chum	Caught	66	20	858	407	58.625	-158.45	14.4 ± 18.5 (0-108)	80%
33052	Chum	Scheduled PU	69	24	803	512	59.625	-162.125	12.7 ± 15.2 (0-136)	84%
32987	Chum	Scheduled PU	60	25	808	309	57.875	-159.675	8.1 ± 10 (0-104)	93%
32996	Chum	Scheduled PU	62	25	811	391	58.625	-159.875	12.5 ± 20.3 (0-148)	88%
32977	Chum	Scheduled PU	62	26	1073	695	60.125	-167.375	8.3 ± 12.3 (0-104)	92%
32985	Chum	Scheduled PU	55	26	577	272	56.125	-164.325	10.7 ± 15.6 (0-118)	90%
32975	Chum	Unknown	57	NA	NA	NA	NA	NA	NA	NA
33048	Chum	Predation	58	NA	NA	NA	NA	NA	19.5 ± 20.9 (0-62)	69%
285366	Chinook	Floater	67	2	61	60	54.875	-161.2	20.7 ± 19 (0-82)	67%
33011	Chinook	Caught	85	7	266	247	54.6	-164.125	31.6 ± 24.3 (0-156)	48%
285363	Chinook	Scheduled PU	86	27	1015	550	59.625	-164.175	14.6 ± 22.1 (0-140)	81%

* All predation events were inferred to be salmon shark predation

a) Ocean days is defined as the number of calendar days from release to end date

b) Cumulative displacement is calculated as the sum of the haversine (horizontal) distances between consecutive most-likely-estimate (MLE) locations across the entire time series.

c) Absolute displacement is calculated as the minimum haversine (horizontal) distance between the release location and the end location (last MLE).

d) Time-weighted mean depth and SD; range is absolute minimum and maximum depth experienced across the entire time series.

e) Percent time 0-25m refers to the proportion of time spent in the 0-25 m depth bin

Discussion

This report will only include conclusive results from tag data that are unlikely to change with further analysis. Our results demonstrate that chum salmon (≥ 48 cm FL) are capable of carrying satellite tags for long distances, at least over a short deployment less than 30 days in duration. Furthermore, our tag data provide empirical evidence that both chum and Chinook salmon can survive after being caught in seine nets and released back into the ocean within a certain amount of time. The extent to which salmon survived after release was highly variable, with a majority of tags releasing prematurely due to inferred salmon shark predation in the Gulf of Alaska. Chum salmon were highly surface oriented, spending most of their time in the upper water column in depths between 0-25 m, and making periodic dives with the deepest recorded depth at 208 m. At minimum, these results show that satellite tags can provide uniquely valuable information on the fine-scale movement and behavior of migrating salmon during their open-ocean phase, and can provide the types of data that can better inform regulation.

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Aleutians East Borough School District

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SERVING THE CHILDREN IN THE ALASKAN COMMUNITIES OF:
AKUTAN, COLD BAY, FALSE PASS, KING COVE, AND SAND POINT
www.aebds.org

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email adfg.bof.comments@alaska.gov
RE: Proposed Area M Restrictions

Chairperson Carlson-Van Dort and Board Members:

My name is Mike Franklin, and I serve as Superintendent of the Aleutians East Borough School District. I am writing to oppose any further restrictions to the Area M fisheries and to urge the Board to consider the certain and irreversible consequences these actions would have for the communities—and especially the children—of the Aleutians East Borough.

The Aleutians East Borough was founded on two inseparable purposes: fisheries and the establishment of a borough-wide school system. Today, our district serves students in Sand Point, King Cove, False Pass, and Akutan—remote communities where schools function not only as educational institutions, but as central civic and cultural anchors. In rural Alaska, schools are where communities gather for events, athletics, public meetings, and shared celebrations, and where generations of families often attend and graduate from the same schools. When a school weakens or closes, the impacts extend far beyond education, triggering permanent and often irrevocable changes to the community's stability, identity, and long-term viability.

From both an educational and fiscal standpoint, further restrictions to Area M fisheries would be doubly devastating for our schools. The Aleutians East Borough provides a local contribution of more than ten percent of the Aleutians East Borough School District's operating budget, and that contribution is largely supported by fisheries tax revenue. Reduced fishing opportunities would directly reduce fish tax revenues, limiting the Borough's ability to support our schools.

At the same time, restrictions that force families to leave the region would reduce student enrollment—the primary driver of state education funding. Fewer families mean fewer students, and fewer students mean less state aid. The combined effect of declining local contribution and declining enrollment would weaken our schools from two directions at once, accelerating program reductions and increasing the risk of school closures.

Fishing in the Aleutians East Borough is not only an economic driver; it is a core part of our culture and community identity. Many students grow up in fishing families, where they learn responsibility, perseverance, and the value of contributing to their households and communities. This sense of purpose builds confidence, resilience, and strength in young people. In communities already facing economic pressure alongside increasing challenges related to mental health and substance abuse, that purpose is not incidental—it is foundational and preventative.

Over the past decade, our district has experienced a steady enrollment decline. We have already lost schools in Nelson Lagoon and Cold Bay, and others remain vulnerable. In rural Alaska, there is a well-understood reality: when families leave, enrollment drops; when enrollment drops, schools close; and when schools close, communities rarely recover.

Our students are already working to overcome significant disruption from COVID-related academic and social impacts. Stable employment, strong community identity, and viable futures at home are among the most important protective factors we can provide. Further restricting Area M fisheries would directly undermine those protections.

I want to emphasize a central point: there continues to be no evidence that restricting fishing in Area M will produce the intended benefits for the Arctic–Yukon–Kuskokwim region. By contrast, the negative consequences for the Aleutians East Borough are not speculative—they are certain. Job losses, population decline, reduced tax revenues, weakened schools, and lasting harm to children and communities would follow directly.

When faced with uncertain potential benefits on one hand and certain, devastating harm on the other, the only rational and responsible decision is to reject or refrain from imposing further restrictions on the Area M fisheries.

Those of us who live and work in this region strongly support sustainable fisheries. We depend on them and want them to endure for generations. Conservation decisions must be grounded in sound science and directed at the true drivers of salmon declines—not at communities that have already adapted, reduced harvest, and demonstrated responsible stewardship.

Protecting salmon and protecting rural communities are not competing goals. In the Aleutians East Borough, they rise and fall together.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Franklin", written over a horizontal line.

Mike Franklin
Superintendent
Aleutians East Borough School District

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I started fishing Area M seining in 1979. The first time I ran a vessel was in 1981, and I became a boat owner in 1992. I have attended Board of Fisheries meetings on this topic since the early 1980s, and here we are more than four decades later.

Any further reduction in time is a direct reduction in income for myself and my crew. There are no other local options to make up for lost income. We already do all the fisheries we can, just trying to make something add up at the end of the year.

I also haven't spent much money maintaining my seine operation lately. Any more time reduction means I'll spend even less to maintain my seine equipment and likely my vessel. That has ripple effects: less fish tax revenue that supports the community, less work for people who service and supply vessels, and overall less money circulating locally. Three seine boats have recently sold out of the community, and more reductions will push more people out.

In my view, the studies I have seen—tagging and genetic work—show that even reducing chum harvest to zero in the June fishery would result in negligible improvement, if any, to AYK river systems. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and cannot be “regulated away.” Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

I'm not going to be doing this much longer, but there are young crew members on my boat who love fishing salmon in Area M, and one has aspirations of buying my boat. Please don't change the June fishery and take that opportunity away from him, or it will likely be another vessel leaving the community.

Respectfully,

Mike Alfieri
Sand Point, Alaska



Jasper Allbrett

Public Comment – Area M Fisheries

I am opposed to Proposals 108, 109, 110, 111, 112, 116, 120, 126, 127, 129, 130, 131, 132, 133, 136, 140, 141, 143, 148, and 152.

I have fished commercially in Alaska for 19 years as an Alaska resident and remain actively engaged as an Alaska fisherman. Although my family and I are temporarily relocated for caregiving responsibilities, we fully intend to return. **I have relied on commercial salmon seining as my primary source of income for those 19 years.**

I have been commercial salmon seining in Area M for the past five seasons and am the owner-operator of my vessel. Area M fisheries provide a critical portion of my annual income and support my entire family of five, now six, for whom I am the sole income earner.

While earlier generations were able to enter fisheries when costs were lower or permits were more accessible, that is no longer the reality today. The cost of entry into any fishery is extremely high, and starting and maintaining a small owner-operated fishing business has become increasingly difficult. Every fishing opportunity matters simply to make ends meet.

Any reduction in time, area, or opportunity in Area M would directly threaten my ability to support my family and continue operating as an independent fisherman. These reductions would also have a ripple effect throughout local communities. Fewer fishing opportunities mean fewer jobs for local crew, reduced income for processors and support businesses, and increased financial pressure on families who depend on this work. In many cases, people may be forced to leave their communities or seek work out of town or out of state simply to survive.

Reductions in fishing time or area also raise serious safety concerns. Compressed openings and reduced access increase pressure to fish in poor weather or unsafe conditions, particularly for small, owner-operated vessels. The current structure of Area M allows fishermen to operate more safely by spreading effort over time and avoiding unnecessary risk.

Fisheries management decisions must also account for variables that cannot be predicted or controlled. Recent events, including global market disruptions and inaccurate salmon return forecasts, have had significant impacts on ex-vessel prices and fishing income. **Specifically, in the two seasons prior to the most recent season, these factors resulted in substantial income losses that nearly forced me out of business entirely, during the same period that adaptive management measures were implemented in Area M.** As a small, owner-operated fisherman with limited access to other fisheries, **I do not have the ability to offset these losses elsewhere.**

While adaptive management measures reduced opportunity and income for all Area M fishermen, I understood them to be necessary and participated in them in good faith. In my

view, the results demonstrated that **adaptive management in Area M has reduced chum harvest and has been effective**, showing that chum salmon harvested in Area M are not driving the declines being attributed to other river systems. Protecting the long-term health of vulnerable river systems ultimately benefits all fisheries and fishing communities.

Maintaining existing fishing time and area in Area M provides critical flexibility that allows fishermen to withstand unforeseen economic and biological variability. Removing that flexibility through additional restrictions increases vulnerability and undermines the long-term viability of independent fishing operations.

I am familiar with the scientific information that has been presented regarding chum salmon distribution, including stock identification data. **Based on what has been presented to the Board to date, the information does not demonstrate a clear need for further reductions in Area M fishing time or area as proposed.** The June Area M fishery has not been shown to be a primary driver of Arctic–Yukon–Kuskokwim chum or Chinook salmon declines. Salmon runs vary widely by river system, and poor returns do not share a single cause. Management actions should reflect this complexity. Further removing management tools and flexibility makes it harder, not easier, to manage mixed-stock fisheries responsibly, and would disproportionately impact small, rural coastal communities and owner-operated fishing businesses while offering little demonstrated biological benefit.

Once fishermen and their families are forced out of these communities, they often do not return. The loss of fishing opportunity risks permanent damage to local economies, working waterfronts, and the next generation of fishermen.

I respectfully ask the Board of Fisheries to maintain existing Area M fishing time and area and to avoid further restrictions that would disproportionately impact small, owner-operated fishing businesses and the coastal communities that depend on them.

Respectfully submitted,

Jasper Allbrett

Commercial Salmon Seiner – Area M

Sitka, Alaska

Chair Woman and Members of the Board,

My name is Benjamin Allen; I am a resident of Chignik Alaska and a commercial fisherman and Tenderman in many places of Alaska. I've been an active part of the AC for many years, I am also serving on CRAA as well as a city council member of the City Of Chignik.

I've got to enjoy the amazing bounty of Alaska for many years, and unfortunately, I have also got to see in the last decade, the drastic reduction and collapses of our fisheries to the degree that we even have some fish moving to the closest edge of being put on the endangered species list. As I feel that we are on a precipice of tipping either direction at this time your decisions will dictate whether or not Alaska stays Alaska, or whether it dwindles into a shell of what it once was, I respect the complexity of your job and the difficult decisions that you'll have to make at this meeting.

I would like to first and foremost state that any change toward the capture of more fish especially in mix stock fisheries will contribute to the further degradation of our areas that are struggling with maintaining sustained yield and putting them in further jeopardy. As most of you know, if not all of you by now there are areas of the state that can't even subsistence fish and yet interception fisheries are allowed to continue to put pressure on these fisheries well in advance of the terminal area.

Last year, one of the most unusual things occurred in the Chignik fishery because of the lack of Chinook Salmon; during the salmon season the lagoon fishery was closed 5 days a week even with ample sockeye salmon return that would have been able to be utilized after multiple years of having disaster fisheries, and yet the local fisherman were only allowed two days a week fishing on their terminal fish because of the lack of the Chinook Salmon that went through the same area to their spawning natal river. At great cost again to the terminal fishery allowances were given and fish were able to meet their escapement numbers very narrowly.

Interception fisheries do not have the same sustainability sacrifice that the CMA has. A place like area M, knows exactly when they will go fishing with scheduled times. And when there is large abundance of fish to be able to be had in all of the fisheries that they prosecute from their impact is not as great. But currently with some fisheries in jeopardy and especially some areas, not even been able to subsistence fish, which is the primary purpose of regulations in Alaska, something must be done differently. In a very short history lesson if you look in the AMR's from long ago in the 70s, when times were tough and the fisheries when the Bristol Bay run did not look like it was going to come in as predicted the board took action in order to preserve the fishery by shutting down area M completely in order to ensure this sustainable yield. Though it was a tough decision, it was the correct one to maintain Alaska's principal values.

I ask that you keep those things in mind when making the decisions at this meeting. Then look at the request by this interception fishery (area M) once again asking for more net, more time and an expansion of that fishery with no care of the neighboring stocks that they have been exploiting for years. Please note that they can always prosecute their local stocks within the bays and closer to their terminuses. When alternately looking at the CMA proposals, they are asking for more restrictive, less nets and reduction of fishing area to try and recover and respond to the difficult time of these fisheries to maintain sustainable yield as well as subsistence fisheries.

I oppose proposals; 119, 121, 123, 124, 134, 137, 138, 139, 142, 144, 145, 146 and 149 as I believe they go against continuing subsistence and sustainable yield.

I support proposals; 111, 112, 120, 126, 127, 128, 129, 130, 131, 132, 133, 136, 140 and 151, I think that these proposals will continue the correction necessary to bring fisheries back to past greatness and sustainability that Alaska can be proud of and continuing to prosper on.

I will oppose proposal 109; as an AC member I voted for it during our meeting, but upon reconsideration and looking into the complexities of how it is set up, I believe it removes a place of prosecuting local pink salmon stocks during certain times and weather, and there is currently no restriction for vessels with lagoon seines to go out and make sets in that area in its current configuration. I don't think that this proposal will give any more area for lagoon vessels, if adopted.

Thank you for your time reading this as well as your service to the state and taking up this decision-making process.
Sincerely,
Benjamin Allen

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I have worked in Sand Point for five years of salmon fishing.

These proposals mean reduced income and earnings. It would be less of an incentive to return to the area for work, and the community would continue to decline economically.

I have watched local fishermen stress with limited time and uncertain fishing to earn a profit for themselves and their crews. These regulations are an unnecessary burden on an already difficult job. It is collective punishment for declines in other areas.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and can't be "regulated away." Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Ealom Allen



Sand Point, AK

Greetings Chairwoman Carlson-Van Dort and Members of the Board,

My husband and I have two Chignik permits, two seine vessels, a Kodiak seine permit, a plethora of commercial fishing gear (pots and longline) and a home in Chignik. We have had to diversify to such a great extent to weather the disastrous economics of the salmon fishery. We are both AC members. We care deeply for the health and wellbeing of all fisheries in Alaska, particularly in Chignik.

That being said, I support Proposals 110, 141, 147, 148, 152, and 143 to effectively promote and provide chum and chinook avoidance. I have seined since 1991 and it is my personal experience that shallower gear does not catch many chum or chinook salmon. Reds and pinks are virtually not affected. Proposal 143 in particular, directly increases accountability to Chinooks where their presence was often overlooked because they didn't fit the definition of "immatures", yet they averaged around 2.7 to 4 lbs.

I support 112, 120, 127, 128, 129, 130, 131, 132, 133, and 136 in that they provide windows free of gear.

I support 111 as it is a tool to avoid Chinooks without limiting time by making it easy to target a more specific area to conserve salmon.

I support 126 as it returns accountability to Chignik stocks that were free from interception prior to 2004.

I support 140 as it aligns areas to the definition "terminal harvest" that is being used to describe them.

I support 151 as it undoes a gillnet gear expansion that channeled what would otherwise be unencumbered salmon into the gillnet.

I do not support 109. After further consideration, I believe it would make a longstanding volume fishing spot for pink salmon during late July and August ineffective because the gear allowed in the Chignik Bay area is much shorter.

I do not support Proposals 119, 121, 123, 124, 134, 137, 138, 139, 142, 144, 145, 146, and 149 because they expand the catching of Chinook or chum or Chignik sockeye. Last year was the first appreciable return for the Chignik fishery since before 2018. It is far too early to advance or advantage an interception fishery that would inevitably negatively affect Chignik

Thank you for your time and understanding.

Sincerely,

Raechel Allen

F/V Arianna Sage

Aaron Anderson

Chignik Lagoon, Alaska

February 2, 2026

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

RE: Opposition to Proposals 108, 109, 111, 112, Support to 110 with amendment.

Dear Chairwoman Carlson-Van Dort and Board Members,

My comments are submitted from the perspective of a year-round resident and tribal member of Chignik Lagoon. My family has fished in Chignik Lagoon and the outer districts for four generations, and I continue this tradition as a lifelong participant. I have held a Chignik purse seine permit since age 19, fishing commercially since childhood in the footsteps of my father and grandfather, and I plan to remain a full-time fisherman. Subsistence fishing is integral to my way of life, and my family's livelihood depends on these waters—which is why informed management decisions under AS 16.05.251 (regulating conservation and allocation) and AS 16.05.258 (subsistence priority) are critical. Through commercial and subsistence harvesting, I support my immediate and extended family, relying on sustainable practices that balance resource conservation with economic viability for local users.

Proposal 108 – Repeal Early June Western/Perryville District Openings

Oppose Proposal 108

I strongly oppose Proposal 108, which seeks to amend 5 AAC 15.357(d) by repealing the allowance for up to three 48-hour commercial purse seine periods in the Western District (excluding Inner Castle Cape) and Perryville District from June 1–July 5.

ADF&G already possesses ample authority under 5 AAC 15.357 and AS 16.05.060 to open or close districts based on real-time scientific data, escapement goals, and run strength assessments. The existing regulation does not mandate openings; it provides discretionary flexibility for ADF&G to respond to in-season conditions, such as sockeye abundance in Chignik while minimizing incidental harvest of non-local stocks like Arctic-Yukon-Kuskokwim (AYK) chum and Chinook. Repealing this would unnecessarily tie ADF&G's hands, potentially reducing harvest opportunities for Chignik fishermen without proven conservation benefits.

ADF&G's emergency order powers (AS 16.05.060) already address vulnerabilities without blanket closures. This proposal risks violating BOF allocation criteria under AS 16.05.251(e) by disproportionately impacting local users.

I urge the BOF to reject proposal 108 and maintain ADF&G's adaptive authority.

Proposal 109 – Expand Chignik Bay District Boundary (Include Jack Point)

Oppose Proposal 109

I strongly oppose Proposal 109, which proposes amending 5 AAC 15.200(b) and 5 AAC 15.357 to expand the Chignik Bay District boundary by incorporating the Jack Point/Jack Bay area (currently in the Central District) into the Chignik Bay District.

Historically and traditionally, Jack Point has never been part of the Chignik Bay District and has been fished with larger nets under Central District regulations. Shifting boundaries would disrupt established fishing patterns and gear specifications, potentially disadvantaging fishermen, like myself, who operate in both Chignik Lagoon and outer districts with appropriately sized gear. Boats can already fish the area with smaller nets under existing rules, but this proposal would only stop boats from fishing with bigger nets, creating an unnecessary restriction that favors one user group over another without demonstrated conservation benefits. Moreover, this change may cross into allocative issues between fishermen in the same fishery and gear type (purse seine), as it would impose Chignik Bay District's stricter aggregate seine and lead length limits (125 fathoms under 5 AAC 15.332(e)) on an area historically fished with longer gear (up to 225 fathoms in outer districts). Such reallocations must be evaluated under the Board of Fisheries' (BOF) criteria in AS 16.05.251(e), including historical use, economic dependence, and equitable distribution among users—criteria this proposal does not adequately address, risking unfair impacts on historical participants without sufficient justification.

Despite the claim of coordinating with local fishermen, I was not made aware of this proposal. This lack of inclusive input undermines the BOF's emphasis on stakeholder collaboration under AS 16.05.251, which requires consideration of historical use, allocation criteria, and the best available information.

I recommend the BOF reject proposal 109 to preserve traditional districts and ensure decisions are based on comprehensive local input.

Proposal 110 – Reduce Seine Depth/Length and Clarify Aggregate Length

Support Proposal 110 with Amendment

I support Proposal 110 to amend 5 AAC 15.332(d)–(e) only if it is modified to increase the aggregate seine and lead length in the Eastern, Central, Western, and Perryville Districts from 225 to 250 fathoms, while adopting the proposed reduction in maximum purse seine depth from 375 to 325 meshes.

Many Chignik fishermen have already shallowed nets to conserve Chinook salmon, a vital cultural and subsistence resource. The proposed depth reduction aligns with proactive conservation efforts amid the Chignik River Chinook's status as a Stock of Management Concern. It will help minimize incidental Chinook harvest while maintaining efficient sockeye operations, supporting sustainable management under AS 16.05.258 (subsistence) and AS 16.05.251(a) (conservation).

To fully realize the proposal's benefits, the BOF can amend it to increase outer district aggregate lengths to 250 fathoms, harmonizing with Kodiak's gear specifications (325 meshes deep, 250 fathoms long under 5 AAC 18.332). This standardization would ease enforcement burdens on ADF&G, reduce compliance issues for fishermen operating across areas, and promote equitable allocation under AS 16.05.251(e) without altering historical practices in Chignik Bay.

I encourage the BOF to amend and pass proposal 110 to bring Chignik seine regulations in line with that of Kodiak.

Proposal 111 – Split Mitrofanina Island Area into East/West Subsections

Oppose Proposal 111

I oppose Proposal 111, which aims to amend 5 AAC 15.357 by creating East and West Mitrofanina Island statistical areas in the Western District.

ADF&G has demonstrated effective in-season management under existing regulations (5 AAC 15.357), including mid-season closures of Mitrofanina Island portions to conserve Chinook and immature salmon. Adding new statistical areas would impose unnecessary regulatory layers, burdening both ADF&G and fishermen without clear benefits. This micromanagement contradicts the BOF's preference for flexible, science-based approaches (AS 16.05.251) and could complicate enforcement.

As a Chignik fisherman, I value ADF&G's ability to evaluate local pink, chum, and sockeye runs dynamically. The proposal assumes finer divisions are needed to avoid Chinook, but current tools like emergency orders (AS 16.05.060) suffice. Splitting areas risks unintended allocation shifts, potentially harming historical users.

I encourage the BOF to reject proposal 111 to avoid over-regulating a system that works.

Proposal 112 – Codify King Salmon Conservation Measures & Caps**Oppose Proposal 112**

I strongly oppose Proposal 112, which seeks to amend 5 AAC 15.357 with new Chinook conservation measures, including area closures in Chignik Bay District, time restrictions in the Mitrofanina Island Area, and harvest caps (1,000 Chinook in 48 hours → 7-day closure; 5,000 total → closure through August 10).

While Chinook conservation is essential—as a subsistence user and tribal member of Chignik Lagoon, where the majority of my family are also tribal members, this stock is vital to our cultural heritage and livelihood—the Alaska Department of Fish and Game (ADF&G) already holds sufficient authority under 5 AAC 15.357 and AS 16.05.060 to implement area closures, such as in Chignik Lagoon, for protection. This has been demonstrated effectively in past seasons through targeted emergency orders.

Codifying these rigid caps and closures would micromanage ADF&G, constraining their ability to make adaptive decisions based on the best available real-time data and scientific assessments. Such inflexibility could unnecessarily curtail sockeye harvest opportunities, disproportionately affecting local tribal fishermen like myself and my family.

The proposal fails to recognize that existing emergency order mechanisms can be used to successfully balance conservation without the need for prescriptive regulatory constraints. The success of the 2025 season proves this. We should empower ADF&G to continue managing dynamically rather than imposing additional burdens that could hinder responsive fisheries governance.

I urge the BOF to reject proposal 112 in favor of maintaining current management tools.

Respectfully submitted,



Aaron Anderson

Phone: [REDACTED]

Email: [REDACTED]

**F/V Lillian Paige
Ronald L. Anderson**
[REDACTED]
Homer, AK [REDACTED]

February 3rd, 2026

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

RE: Opposition to Proposals 108, 109, 111, 112, Support to 110 with amendment.

Dear Chairwoman Carlson-Van Dort and Board Members,

My comments are submitted from a previously year-round resident of Chignik Lagoon. My family has fished in Chignik Lagoon and the outer districts for four generations, and I will continue this tradition through family knowledge and participation. I have held a Chignik purse seine permit for 11 years, and have been fishing commercially since childhood. Following in the footsteps of my father and grandfather I plan to remain a full time fisherman. Subsistence fishing is integral to my way of life, and my family's livelihood depends on these waters—which is why informed management decisions under AS 16.05.251 (regulating conservation and allocation) and AS16.05.258 (subsistence priority) are critical. Through commercial and subsistence harvesting, I support my immediate and extended family, relying on sustainable practices that balance resource conservation with economic viability for local users.

Proposal 108 – Repeal Early June Western/Perryville District Openings

Oppose Proposal 108

I strongly oppose Proposal 108, which seeks to amend 5 AAC 15.357(d) by repealing the allowance for up to three 48-hour commercial purse seine periods in the Western District (excluding Inner Castle Cape) and Perryville District from June 1–July 5. ADF&G already possesses ample authority under 5 AAC 15.357 and AS 16.05.060 to open or close districts based on real time scientific data, escapement goals, and run strength assessments. The existing regulation does not mandate openings; it provides discretionary flexibility for ADF&G to respond to in-season conditions, such as sockeye abundance in Chignik while minimizing incidental harvest of non-local stocks like Arctic-Yukon-Kuskokwim (AYK) Chum and Chinook. Repealing this would unnecessarily be ADF&G's hands, potentially reducing harvest opportunities for Chignik fishermen without proven conservation benefits.

ADF&G's emergency order powers (AS 16.05.060) already address vulnerabilities without

blanket closures. This proposal risks violating BOF allocation criteria under AS 16.05.251(e) by disproportionately impacting local users.

I urge the BOF to reject proposal 108 and maintain ADF&G's adaptive authority.

Proposal 109 – Expand Chignik Bay District Boundary (Include Jack Point)

Oppose Proposal 109

I strongly oppose Proposal 109, which proposes amending 5 AAC 15.200(b) and 5 AAC 15.357 to expand the Chignik Bay District boundary by incorporating the Jack Point/Jack Bay area (currently in the Central District) into the Chignik Bay District. Historically and traditionally, Jack Point has never been part of the Chignik Bay District and has been fished with larger nets under Central District regulations. Shifting boundaries would disrupt established fishing patterns and gear specifications, potentially creating disadvantages for fishermen, like myself, who operate in both Chignik Lagoon and outer districts with appropriately sized gear. Boats can already fish the area with smaller nets under existing rules but this proposal would only stop boats from fishing with bigger nets, creating an unnecessary restriction that favors one user group over another without demonstrated conservation benefits. Moreover, this change may cross into allocative issues between fishermen in the same fishery and gear type (purse seine), as it would impose Chignik Bay District's stricter aggregate seine and lead length limits (125 fathoms under 5 AAC 15.332(e)) on an area historically fished with longer gear (up to 225 fathoms in outer districts). Such reallocations must be evaluated under the Board of Fisheries' (BOF) criteria in AS 16.05.251(e), including historical use, economic dependence, and equitable distribution among users—criteria this proposal does not adequately address, risking unfair impacts on historical participants without sufficient justification.

Despite the claim of coordinating with local fishermen, I was not made aware of this proposal. This lack of inclusive input undermines the BOF's emphasis on stakeholder collaboration under AS 16.05.251, which requires consideration of historical use, allocation criteria, and the best available information.

I recommend the BOF reject proposal 109 to preserve traditional districts and ensure decisions are based on comprehensive local input.

Proposal 110 – Reduce Seine Depth/Length and Clarify Aggregate Length

Support Proposal 110 with Amendment

I support Proposal 110 to amend 5 AAC 15.332(d)–(e) only if it is modified to increase the aggregate seine and lead length in the Eastern, Central, Western, and Perryville Districts from 225 to 250 fathoms, while adopting the proposed reduction in maximum purse seine depth from 375 to 325 meshes. Many Chignik fishermen already have shallow nets to conserve Chinook salmon, a vital cultural and subsistence resource. The proposed depth reduction aligns with proactive conservation efforts amid the Chignik River Chinook's status as a Stock of Management Concern. This will help minimize incidental Chinook harvest while maintaining efficient sockeye operations, supporting sustainable management under AS 16.05.258 (subsistence) and AS 16.05.251(a) (conservation).

To fully realize the proposal's benefits, the BOF can amend it to increase outer district aggregate lengths to 250 fathoms, harmonizing with Kodiak's gear specifications (325 meshes deep, 250 fathoms long under 5 AAC 18.332). This standardization would ease enforcement burdens on ADF&G, reduce compliance issues for fishermen operating across areas, and promote equitable allocation under AS 16.05.251(e) without altering historical practices in Chignik Bay.

I encourage the BOF to amend and pass proposal 110 to bring Chignik seine regulations in line with that of Kodiak.

Proposal 111 – Split Mitrofanina Island Area into East/West Subsections

Oppose Proposal 111

I oppose Proposal 111, which aims to amend 5 AAC 15.357 by creating East and West Mitrofanina Island statistical areas in the Western District. ADF&G has demonstrated effective in-season management under existing regulations (5 AAC 15.357), including mid-season closures of Mitrofanina Island portions to conserve Chinook and immature salmon. Adding new statistical areas would impose unnecessary regulatory layers, burdening both ADF&G and fishermen without clear benefits. This micromanagement contradicts the BOF's preference for flexible, science-based approaches (AS 16.05.251) and could complicate enforcement.

As a Chignik fisherman, I value ADF&G's ability to evaluate local Pink, Chum, and Sockeye runs dynamically. The proposal assumes finer divisions are needed to avoid Chinook, but current tools like emergency orders (AS 16.05.060) suffice. Splitting areas risks unintended allocation shifts, potentially harming historical users.

I encourage the BOF to reject proposal 111 to avoid over-regulating a system that works.

Proposal 112 – Codify King Salmon Conservation Measures & Caps

Oppose Proposal 112

I strongly oppose Proposal 112, which seeks to amend 5 AAC 15.357 with new Chinook conservation measures, including area closures in Chignik Bay District, time restrictions in the Mitrofanina Island Area, and harvest caps (1,000 Chinook in 48 hours → 7-day closure; 5,000 total → closure through August 10).

While Chinook conservation is essential—as a subsistence user and tribal member of Chignik Lagoon, where the majority of my family are also tribal members, this stock is vital to our cultural heritage and livelihood. The Alaska Department of Fish and Game (ADF&G) already holds sufficient authority under 5 AAC 15.357 and AS 16.05.060 to implement area closures, such as in Chignik Lagoon, for protection. This has been demonstrated effectively in past seasons through targeted emergency orders. Codifying these rigid caps and closures would micromanage ADF&G, constraining their ability to make adaptive decisions based on the best available real-time data and scientific assessments. Such inflexibility could unnecessarily curtail sockeye harvest opportunities, disproportionately affecting local tribal fishermen like myself and my family.

The proposal fails to recognize that existing emergency order mechanisms can be used to successfully balance conservation without the need for prescriptive regulatory constraints. The success of the 2025 season proves this; We should empower ADF&G to continue managing dynamically rather than imposing additional burdens that could hinder responsive fisheries governance.

I urge the BOF to reject proposal 112 in favor of maintaining current management tools.

Respectfully Submitted,

Ronald L. Anderson
Life Long Commercial Fisherman

Phone: [REDACTED]

E-mail: [REDACTED]

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Mark Andrich. I have fished in and around King Cove, False Pass, and Sand Point for nearly 50 years. I consider many of the people in these communities my extended family. I grew up alongside them, fished commercially with them, shared meals in their homes, and raised families together.

The past two years have been the worst seasons I have experienced in my 45 years of fishing. The closure of the King Cove processing plant has added significant hardship. The plant processed more than salmon, and its closure eliminated tax revenue, freezer capacity, ice production, bait access, and increased travel distances for delivering catch—raising fuel costs, time on the water, and risk to life.

There is now no local freezer capacity, no ice plant, and no ability to ship frozen food into King Cove. Fishermen must travel farther to deliver fish, incurring additional insurance, fuel, and crew costs while earning less.

Further restricting fishing opportunity will only compound these hardships. People are already moving away, taking additional jobs, and struggling to stay afloat. Salmon run failures cannot be blamed on one area. Migration patterns, water temperature, flooding, habitat impacts, food supply, and ocean conditions all play a role.

Area M fishermen catch a small fraction of chum compared to other regions. Punishing one area ignores the complexity of the system and threatens communities that have depended on these fisheries for generations.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Respectfully,

Mark Andrich
King Cove & False Pass, Alaska



Area M Seiners Association

Sand Point, Alaska
Board of Fisheries Finfish Meeting
 February 18 - 24, 2026
 Anchorage, Alaska

Alaska Board of Fisheries
 PO Box 115526
 Juneau, AK 99811-5526
 Email dfg.bof.comments@alaska.gov

RE: Comments by Area M Seiners for Alaska Peninsula, Aleutians, & Chignik Finfish Meeting, February 2026

Support Proposals: 107, 113, 114, 119, 121, 122, 123, 124, 134, 135, 137, 139, 142, 144, 145, 154

Opposed Proposals: 108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, 143, 147, 148, 149, 151, 152

Dear Chair Carlson-Van Dort and Board of Fish Members:

Area M Seiners Association submit these comments on proposals to change regulations for the Alaska Peninsula, Aleutian & Chignik Finfish meeting pertaining to Area M salmon seine fisheries. Area M Seiners Association is a 501(c)(6) not-for-profit corporation that represents the interests of fishermen, processors, tender men, crew, and families associated with Area M salmon fisheries. Area M Seiners look forward to working with the Board on proposals affecting our fisheries.

The commercial fisheries of Area M support communities and families on the Alaska Peninsula, including the Native tribes of Belkofski, Unga, Agdaagux, Pauloff Harbor, Qagan Tayagungin, and False Pass, that have fished these waters for ten thousand years. Many of the region's 3,600 inhabitants rely on commercial harvests to provide for their families, often by sharing a portion of their harvest. Like Interior communities' salmon harvest is distributed widely and has deep historical roots. These communities are struggling due the closure of Peter Pan Seafoods and declining fish prices which affects processing jobs and raw fish taxes vital to public education, infrastructure, and local governments. It appears that some of the groups submitted proposals regarding Area M salmon fisheries are attempting to pit commercial fishermen against Alaska Interior subsistence fishermen by creating false narratives about the Area M commercial fishery. Most Area M salmon fishing permits are owned and fished by Alaska residents. Specific to Area M purse seine permits, Aleutians East Borough (AEB) residents averaged 70% of the permits fished between 1980-2020.¹

Area M fishermen have taken action to lower the June chum harvest. Chum harvest in 2025 was down 62% from 2024 and down 67% from the past five- and ten-year average harvests. The decrease in chum harvest would not have occurred if it were not for the seiners' adaptive management program and diligent actions of the Area M Seiners Association. The efforts of processors, ADFG, the 2023 Board of Fisheries, and fishermen have demonstrated a commitment to responsible fisheries management and an innovative and, most importantly, an effective action plan.

¹ Hartley M., A Review of Key Fisheries for the AEB from 1980–2020 <http://www.aebfish.org/AEBKeyFindingMemo03132022.pdf>

Proposal 107 SUPPORT– 5 AAC 09.XXX and 15.XXX Adopt marking and reporting requirements for commercially caught salmon retained for a person’s own use and not sold in the Alaska Peninsula, Aleutian Islands, and Chignik management areas.

We agree with this proposal’s intent but recommend leaving specific fin-clipping protocols and practices to the Department of Fish and Game (ADFG). There is little, if any, “illegal fish sale” of salmon taken on commercial vessels for personal use and then sold for profit, as the proposal suggests. Sufficient regulations and enforcement are already in place to account for salmon taken on commercial vessels. However, modifying the regulation to include fin clipping to identify home pack or personal use salmon may be a useful tool to resolve the appearance of non-reporting.

Proposal 113 SUPPORT– 5 AAC 09.310. Fishing seasons. and 5 AAC 09.350. Closed waters. Amend fishing seasons to allow more fishing time and area for set and drift net gear in the Caribou Flats Section

The Nelson River (Sapsuk) escapement goal range is 97,000 to 217,000; this appears to be a rearing-limited system. When over-escapement of sockeye occurs in a rearing-limited systems, more fry are produced than the system’s secondary producers (zooplankton) can sustain, which then causes a crash in zooplankton abundance². The zooplankton crash cascades bottom-up, which in turn decreases sockeye survival. The crash has an immediate effect on emergent fry but a delayed effect on adult production, appearing 4 to 5 years later. Escapement to Nelson River exceeded the upper limit in three of the last five years; escapement in 2024 (754,000) and 2025 (525,000) were almost 350% and 250%, respectively, of the upper bound.

Active Nelson Bay commercial salmon permit use has fallen in recent years and is insufficient to harvest larger runs as seen in 2024 and 2025. This results in not only taxing lake productivity but also is foregone harvest opportunity. Adopting a regulation that would allow drift and setnet opportunities in Caribou Flats during years of high Sapsuk sockeye returns is a win for maximizing sockeye productivity and maximum sustained yield.

² Koenings J., et.al. 1997. Consequences to Juvenile Sockeye and the Zooplankton Community Resulting from Intense Predation

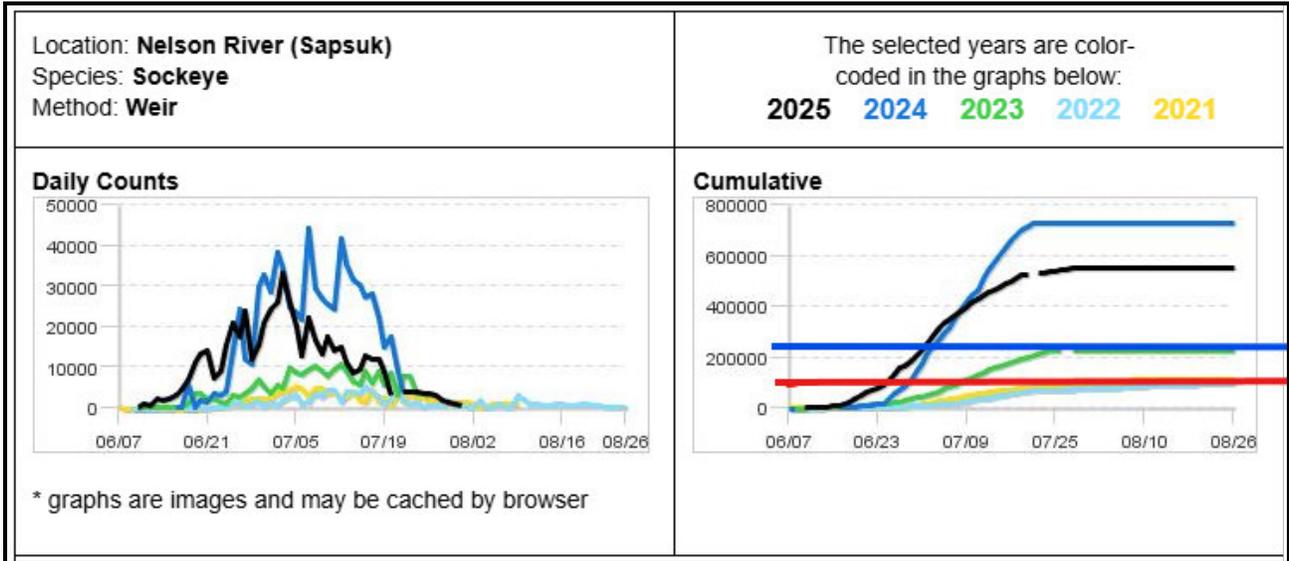


Figure 1. 2021 – 2025 escapements to Sapsuk, Nelson River, lower bound 97,000 (red horizontal line) and upper bound 217,000 (blue horizontal line). Data ADF&G

<https://www.adfg.alaska.gov/sf/FishCounts/index.cfm?ADFG=main.displayResults&COUNTLOCATIONID=32&SpeciesID=410>

Proposal 114 SUPPORT – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Amend the Northern District Salmon Fisheries Management Plan to delete sunset language. Agree with ADF&G comments to repeal sunset language.

Proposal 119 SUPPORT – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan. Amend the Southeastern District Mainland Salmon Management Plan to increase commercial salmon fishing time for set gillnet and seine gear

The current restrictions often prevent Southeastern District Mainland (SEDM) fishing entirely or limit it to brief periods, denying access to local, traditional fishing grounds and threatening the viability of set netting in the area. This proposal eliminates both the Chignik pre-harvest requirement and the 7.6% allocation. Instead, beginning July 1, SEDM set net fishermen should be allowed to fish concurrently with the Chignik area, with purse seine beginning July 11. The 80% and 20% language should be removed from the regulation. This revision of 5 AAC 09.330 is fair and has significant historical precedent. In the 1970’s these areas were open to set netters. Stepovak and adjacent areas have ancient building remains, a testament to the traditional nature of these fishing grounds.

Proposal 121 SUPPORT – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan. Remove 600,000 fish sockeye salmon allocation from the Southeastern District Mainland Salmon Management Plan.

Proposal 121 requests that the SEDM Salmon Management Plan be decoupled from the Chignik/Area L harvest thresholds of 300,000 early-run and 300,000 late-run Chignik sockeye, allowing SEDM harvests to proceed concurrently with Chignik harvest.

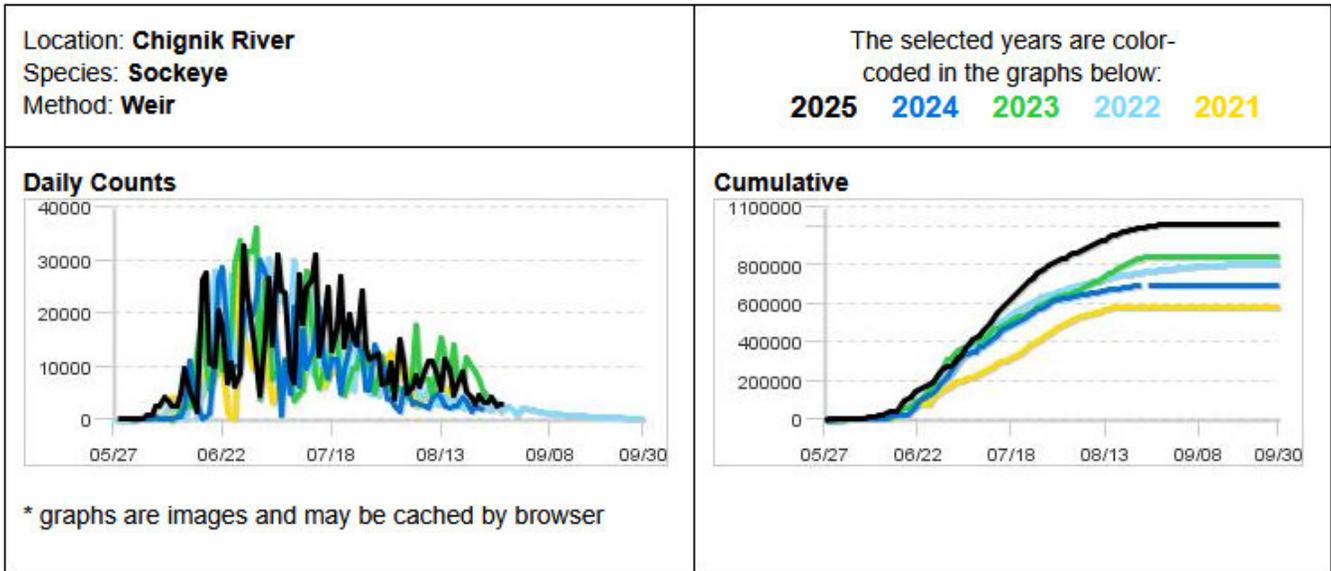


Figure 2. Chignik River sockeye escapement 2021 – 2025, BEG goal 450,000–800,000

In 2025, Chignik Lake sockeye escapement exceeded one million (BEG goal 450,000–800,000), while the Chignik fishery harvested 830,000 sockeye. Combined harvest plus escapement exceeded the forecast by roughly 500,000 fish. Decoupling would restore historical opportunity for increased SEDM harvests, while ADFG would retain existing authority to manage Chignik sockeye to meet sustainable escapement objectives and Area L harvest goals.

Table 1.– Estimated Chinook, sockeye, coho, pink, and chum salmon, and Dolly Varden escapement to the Chignik River, 2010 to 2025.							
Year	Escapement						
	Chinook ^a	Sockeye ^d		Coho	Pink	Chum	Dolly Varden
		Early-run	Late-run ^b				
2010	3,679	450,518	293,395	5,152	3,670	95	17,578
2011	2,728	492,557	261,259	5,293	16,298	145	19,225
2012	1,449	360,709	351,682	2,663	2,849	73	18,032
2013	1,253	404,753	351,349	16,783	7,231	72	17,230
2014	2,895	353,798	297,812	15,572	3,171	58	44,899
2015	2,054	421,848	702,051	60,209	4,269	54	16,346
2016	1,843	416,711	356,464	14,187	486	114	24,625
2017	1,137	420,497	372,064	33,270	123,531	615	7,664
2018	825	182,974	356,724	64,214	3,222	54	4,550
2019	1,517	387,110	294,889	282	18,073	67	6,242
2020	1,278	178,785	152,192	6,964	10,614	124	4,919
2021	1,172	295,726	345,216	0	6,057	25	4,363
2022	761	412,228	395,858	10,903	12,558	90	1,238
2023	267	431,283	457,071	1,366	19,696	26	605
2024	1,166	372,831	354,749	1,082	2,836	58	1,428
2025	1,391	399,019	659,253	5,101	260,769	54	2,174
Averages^c							
2015–2024	1,202	351,999	378,728	19,248	34,325	123	7,198
2020–2024	929	338,171	341,017	4,063	12,877	65	2,511

^a No escapement adjustments were made for Chinook salmon that spawn below the weir, or those removed by the sport and subsistence fisheries above the weir.
^b Late-run sockeye salmon totals include a weir estimate and post-weir escapement estimate using a time series analysis.
^c Pink salmon averages include odd years only.
^d Escapement values have been retroactively updated with a run timing model implemented in 2022.

Figure 3. Chignik escapements from 2010 – 2025. Escapements from 2023 – 2025 were well over the 5-year and ten-year averages.

Proposal 122 SUPPORT – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan. Amend the Southeastern District Mainland Salmon Management Plan to make changes to Chignik River sockeye salmon allocation

This proposal seeks to delink the SEDM Salmon Management Plan from the 300,000 early-run and 300,000 late-

run Chignik sockeye harvest in Area L, so the SEDM harvest can be prosecuted simultaneously. In 2025, the Chignik Lake sockeye escapement was just over a million sockeye (BEG 450,000 – 800,000) while the Chignik fishery harvested 830,000 sockeye salmon. Harvest plus escapement surpassed the forecast by a half million-sockeye salmon. This change would provide more opportunity for harvest in SEDM as was the case historically. ADFG would maintain current Chignik sockeye BEG goals for sustainable escapement and management for Area L harvest opportunities.

Proposal 123 SUPPORT – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan. Amend the Southeastern District Mainland Salmon Management Plan to reflect changes to Chignik River sockeye salmon allocation.

This is an innovative proposal that does not change the current harvest and allocation of Chignik sockeye if two conditions are met: 1) there is local Area L processing capacity for the forecasted run strength, and 2) there are 61 or more fishing boats registered in the district. Otherwise, new language will establish harvest objectives associated with number of registered harvest boats in the district.

The current regulation guaranteeing Chignik harvesters 600,000 fish (300,000 for each run) needs modification. This rule was established when 95 boats harvested salmon in the Chignik District, but in recent years Chignik Management Area (CMA) has seen only 35 or fewer boats. Additionally, processing has shifted from a local Chignik processor to Kodiak or False Pass processors. Sections (b), (c), and (d) of 5 AAC 09.360 no longer align with current fishing practices in the SEDM and Chignik Districts. These sections should be deleted and replaced with new ones that reflect present realities of both fisheries. The intent of this proposal is to create a more equitable balance between the SEDM and CMA fisheries without creating a conservation concern for Chignik sockeye, as all other regulations remain in place.

Proposal 124 SUPPORT – 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan. Amend the Southeastern District Mainland Salmon Management Plan to reflect changes to Chignik River sockeye salmon allocation.

Based on WASSIP 2006-2008 sockeye genetic stock analysis (GSA),³ the Chignik stock harvest in East Stepovak, Balboa Bay and Beaver Bay June harvests were not sampled. Though July harvest GSA was imperfect, ADFG estimated a maximum of nearly 60% Chignik sockeye, 30% South Peninsula and 10% East of WASSIP, data that clearly support lowering the proportion of Chignik sockeye to 55-68%.

Proposal 134 SUPPORT – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Amend the South Unimak and Shumagin Islands June Salmon Management Plan to increase commercial salmon fishing time for purse seine and drift gillnet gear.

5 AAC 09.365 was modified in March 2023, primarily due to poor Yukon River summer chum escapements in 2021 and 2022. Since then, escapements at Pilot Station have been within the biological goal range of 500,000 to 1.2 million, with 845,988 in 2023 and 758,260 in 2024. It was anticipated that the 2025 Yukon chum escapement would be low due to the parent year (2021) having the lowest escapement on record – 153,718. The offspring from egg deposition in 2021 was diminished as well, resulting in poor adult returns four years later, the dominant age cohort. Even so the

³ ADF&G WASSIP report: <https://www.adfg.alaska.gov/FedAidpdfs/SP12-24.pdf>

escapement in 2025 was 347,346, a 225% increase from the parent year.

Poor chum productivity and escapements on the Yukon and Kuskokwim are driven by climate factors, not the small CWAK chum harvest rate (averaging ~5%) in the Area M June fishery. Research by NOAA Fisheries and the International Year of the Salmon (IYS) shows that the poor 2021-2022 chum escapements resulted from extreme-warm ocean conditions in the Bering Sea and North Pacific Ocean during 2016-2019. These conditions adversely affected juvenile Yukon (CWAK stock) chum salmon, leading to low survival rates. In 2022, about 96,000 CWAK chum were harvested in the June fishery. These CWAK chum are composed of Kuskokwim, Bristol Bay, Yukon, Norton Sound and many other salmon streams along the 800 miles of coastline from the Alaska Peninsula to Norton Sound.

Importantly, Area M Seiners implemented an adaptive management plan informally during June 2022 and formally at the 2023 Board of Fisheries meeting for the 2023-2025 June fisheries. The Board endorsed this plan, which has significantly reduced chum harvest in the June fishery. We propose to continue this adaptive management strategy. The adaptive management strategy focuses on sockeye harvest but electively stands down from fishing when high concentrations of chum are observed. Considerable fishing time is lost in this effort to reduce chum catch in the June sockeye fishery.

Proposal 135 SUPPORT – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Create a new regulation to provide the department emergency order authority to require non-retention of king salmon and to amend the retention provision.

Non-retention of Chinook salmon is a common management practice in Alaska, from Southeast to Kodiak. Chinook 28” and greater have a higher survival rate when released from seine nets than smaller sized chinook. We requested that ADFG implement Chinook non-retention in 2025 through emergency order. After much discussion, ADFG settled on status quo and refused to allow non-retention of chinook in the Area M June salmon fishery. Considering ongoing concerns about king salmon populations across the North Pacific, we propose implementing a new regulation for the June seine fishery in the Shumagin and South Unimak areas. This measure would require the release of all king salmon measuring 28 inches or greater in length. This practice is standard and common in other fisheries in Alaska as a measure to protect chinook salmon.

The need for this regulation is underscored by recent harvest data and genetic stock analysis. In 2024 and 2025, during the Area M June fisheries, harvesters caught 1,257 and 1,371 king salmon respectively⁴. While these numbers may seem modest, it's important to consider the origin of these fish. According to a 2014 genetic stock analysis conducted by ADFG, nearly two-thirds (64.2%) of the Chinook salmon harvested in this June fishery originated from British Columbia and the West Coast of the United States.

Although only a small portion of these migratory king salmon may be destined for Alaskan rivers such as Bristol Bay, Yukon, and Kuskokwim, the current state of low abundance across many salmon populations requires additional conservation. By requiring the release of larger king salmon, we aim to give these fish - which are often the most productive spawners - a chance to complete their journey and contribute to the next generation. This proposed regulation

⁴ <https://www.adfg.alaska.gov/static/applications/defnewsrelease/1642226461.pdf> and <https://www.adfg.alaska.gov/static/applications/defnewsrelease/1744698737.pdf>

strikes a balance between maintaining the June seine fishery and contributing to conservation efforts. It allows fishing activities to continue while potentially benefiting various North Pacific king salmon stocks that are currently struggling. In these times of low abundance, this action is meaningful.

By implementing this measure, we take a proactive step towards salmon conservation, aligning our local practices with the broader goal of sustaining and restoring king salmon populations across their range. This approach demonstrates our commitment to responsible fishery management and the long-term health of our shared marine resources.

Proposal 137 SUPPORT – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
Amend the South Unimak and Shumagin Islands June Salmon Management Plan to increase commercial salmon fishing time for set gillnet gear.

This regulation would add a single day to set gillnet gear at the end of the June season, changing June 28 to June 29. Set gillnet gear is affected by inclement weather more than the purse seine and gillnet fleets; frequently, they lose fishing time due to weather. Additionally, the set gillnet fleet harvests many fewer salmon, and therefore the impact on the resource would be small, although the benefit could be meaningful.

Proposal 139 SUPPORT – 5 AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula.
Amend the Post-June Salmon Management for the South Alaska Peninsula to increase commercial salmon fishing periods for set gillnet gear as follows:

ADFG needs additional tools for assessing local stock strength in August. Currently, the area management biologist (AMB) conducts aerial surveys of streams and rivers when conditions allow, but inclement weather often prevents observations or flights. By utilizing set nets and cape fishing as a kind of test fishery, the AMB will obtain better and more consistent stock assessment data. Building a long-term data set with known time, area, and gear will provide an invaluable tool for management now and in the future.

Proposal 142 SUPPORT – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.
Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to increase commercial salmon fishing time and area in the South Alaska Peninsula.

Early August pink and chum escapement and run strength on the South Peninsula are often difficult to assess from the air. Inclement weather frequently hampers or precludes aerial surveys, and the current regulation requires all gear types to open simultaneously, preventing managers from using the fleet strategically to assess runs. Because all gear types must have equal time, managers risk over-harvest if they try to target specific stocks and therefore lose the ability to tailor effort to real-time run strength and composition.

Allowing selective openings—targeted use of seine, set, or drift gillnets by sub-district and limited duration—would give AMBs the flexibility to collect reliable run information during poor weather without jeopardizing vulnerable stocks. Targeted openings would also keep the fleet and processors operational, reduce the likelihood of unnecessary full closures, and lower the risk of depleted returns. Therefore, we propose the following:

5 AAC 09.365 (e) From August 1 through August 31 the commissioner MAY open by Emergency Order the fishery by specific or multiple gear types for concurrent or nonconcurrent periods.

This targeted approach will likely yield superior in-season information. Deploying a smaller, defined fleet for focused assessments reduces harvest risk while providing area biologists with timely, high-quality data—enabling fuller and more sustainable use of the resource.

Proposal 144 SUPPORT – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Amend the Post-June Salmon Management for the South Alaska Peninsula to increase commercial salmon fishing periods for set gillnet gear.

ADFG needs an additional tool for assessing local stock strength in August. Currently the AMB conducts aerial surveys of streams and rivers when conditions allow, but inclement weather often prevents observations or flights. By utilizing set nets as a kind of test fishery the AMB can obtain better and more consistent stock assessment data. Building a long-term data set with known time, area, and gear will provide an invaluable tool for management in the future.

Proposal 145 SUPPORT – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Amend the Post-June Salmon Management for the South Alaska Peninsula to increase commercial salmon fishing time and area. (SAME AS PROPOSAL 142)

Early August pink and chum escapement and run strength on the South Peninsula are often hard for the Department to gauge from the air. Inclement weather hampers or even precludes aerial surveys, and the current management plan prevents the Department from using the fleet strategically to assess runs. Because all gear types must be opened simultaneously, managers fear over-harvest and lose the ability to tailor effort to assess real-time run strength and composition. Allowing selective openings—targeted use of seine, set, or drift gillnets by section and duration—would give area biologists the flexibility to collect reliable run information during poor weather without jeopardizing vulnerable stocks. At the same time, targeted openings would keep the fleet and processors operational and reduce the likelihood of unnecessary closures or depleted returns. Therefore, we propose the following:

5 AAC 09.365 (e) From August 1 through August 31 the commissioner MAY open by Emergency Order the fishery by specific or multiple gear types for concurrent or nonconcurrent periods.

This innovative approach will likely provide better information than is currently available in-season. Targeted assessment by a smaller fleet in a defined area reduces risk yet provides valuable information to the area management biologist yielding a fuller and sustainable utilization of the resources.

Proposal 154 SUPPORT – 5 AAC 27.610. Fishing seasons and periods for Alaska Peninsula-Aleutian Islands Area.

Establish a summer herring food and bait fishery

The herring stocks are at very high abundance and underutilized in the Alaska Peninsula. Herring generally has its highest value as food and bait. Processors and fishermen would benefit from this addition to the regulations.

Area M Seiners Association opposes the following proposals:

Proposal 108 OPPOSE – 5 AAC 15.357. Chignik Area Salmon Management Plan. Amend the Chignik Salmon Management Plan to reduce commercial salmon fishing time.

The basis for this regulation change is to save Chinook and chum during the June fishery if an opening should

occur. This is a transparent bait-and-switch tactic targeting Area M. If Chignik fishermen want to help Chinook stocks, they should propose non-retention of Chinook for the entirety of Area L; and if they want to pass more CWAK chum, they should consider an adaptive management plan similar to Area M.

Eliminating fishing opportunities with no specified benefit is counterproductive to the long-term viability of the Chignik fishery. Currently, there are many fewer seiners harvesting in Area L than has historically been the case. Land-based processors no longer operate in the community of Chignik and fish are tendered to far-off processing plants. However, reducing time and area for all of June is shortsighted and undermines a viable Chignik fishery in the future.

Proposal 109 OPPOSE – 5 AAC 15.200. Fishing districts, sections, and subsections. 5 AAC 15.357. Chignik Area Salmon Management Plan. Amend the boundaries of the Chignik Bay District to increase area in the Chignik Bay District

Proposal 109 is an attempt to add area to the Chignik Bay District by taking it from the Central District, a mixed stock fishery area that likely has East of Kodiak, CWAK, and other stocks passing through. WASSIP data has been collected for these CMA areas and should be analyzed for genetic stock composition prior to any changes in the Central District or Chignik Bay District. Expanding the Chignik Bay District would also provide more hook-offs and therefore increase harvest rates in an area already struggling to get Chinook into Chignik. This proposal would hamper ADFG's ability to manage Chinook and compare the new statistical areas to historical records.

Proposal 110 OPPOSE – 5 AAC 15.332. Seine specifications and operations. Amend the seine specifications to decrease the allowable depth and length

The sole basis for this proposal as stated is to prevent harvesting of king salmon. Rather than incur the cost of modifying existing seines, we suggest non-retention of chinook for the fishing season. In a 1996 study by Candy J., et al.,⁵ they used ultrasonic telemetry to estimate that about 77% of Chinook salmon captured in seine nets and released to the ocean survived. This aligns with a pilot study conducted in Area M in 2025 by Levi C.⁶

Modifying nets is a costly endeavor. There is insufficient scientifically documented evidence to suggest shallower nets result in decreasing chinook harvest. If nets require modification, seine nets would need to be barged to Seattle, cut, redesigned, and shipped back, or new nets would need to be purchased. Furthermore, there is no way of knowing where Chinook reside in the water column during the June fishery. Freshwater C., et al.⁷ in research conducted in Washington and Vancouver Island coastlines, note that vertical habitat selection by Chinook was determined by a suite of factors including bathymetry, seasonality, location, and life history stage. Therefore, this is an untenable proposal that will not likely accomplish the stated goal as effectively as releasing Chinook 28" or larger both inside Chignik Bay District as well as all districts in the CMA.

We propose this alternative language for the Board to consider:

5 AAC 09.xxx. Retention of king salmon taken in a commercial fishery. This regulation is in place to

⁵Candy et al. 1996. Adult chinook salmon behavior and survival after catch and release from purse-seine vessels in Johnstone Strait, British Columbia. N. Am. J. Fish. Manage.

⁶ Levi C. 2025, personal communication

⁷ Freshwater C., 2024. Chinook salmon depth distributions on the continental shelf are shaped by interactions between location, season, and individual condition

provide guidance to the department when it is determined that conservation is required for king salmon. Notwithstanding 5 AAC 09.365 (e), from June 1 through October 31, if the department determines a need to conserve king salmon, the commissioner may, by emergency order, close the commercial salmon fishery and immediately reopen the commercial salmon fishery, during which king salmon 28 inches or greater in length may not be retained, and king salmon 28 inches or greater in length taken incidentally in the commercial salmon fishery must be returned to the water unharmed.

Proposal 111 OPPOSE – 5 AAC 15.357. Chignik Area Salmon Management Plan. Amend the Chignik Area Salmon Management Plan to create two new statistical areas in the Western District

Bisecting Mitrofanina Island into discrete east and west statistical areas for the purpose of Chinook conservation is a transparent move to game the system for additional time and area when Chignik Chinook are a stock of concern. Currently, Mitrofanina subdistrict closures are triggered when Chinook harvest reaches the threshold described in the Chignik Chinook Stock of Concern Action Plan. Under existing regulations, closures have occurred primarily for interceptions on the west side of Mitrofanina (sub district 273–74). The proposed regulation does not specify how newly defined areas would operate; however, if the west side closes for Chinook conservation, the east side will presumably remain open, leaving a loophole for continued interception.

A more effective conservation measure would be adoption of non-retention of Chinook across all Commercial Management Area (CMA) districts. Most CMA districts outside Chignik Lagoon are mixed-stock fisheries and include Chinook stocks that need reduced harvest, not additional harvest. Implementing non-retention in all CMA districts would more uniformly protect vulnerable Chinook populations and eliminate creating an additional sub-area that would likely undermine conservation goals.

Proposal 112 OPPOSE – 5 AAC 15.357. Chignik Area Salmon Management Plan. Amend the Chignik Area Management Plan to include area closures and king salmon caps for king salmon conservation

This proposal modifies the Chignik Chinook Stock of Concern Action Plan by adding a section under **5 AAC 15.357 (B)** for July 1 -31 with provisions to close areas in or near Chignik Bay and Lagoon, but more significantly maintaining openings in the Mitrofanina Island Area of the Western District for periods of 48 hours with 72-hour closures. Additionally, the proposal sets Chinook thresholds of 1,000 and 5,000 for the July fishery that would result in a closure by statistical area with length of time provisions.

We oppose this proposal. The existing Stock of Concern Action Plan has been effective in rebuilding Chignik Chinook. In 2025 Chinook barely reached the lower bound of escapement, and expanding fishing time in the Mitrofanina mixed-stock area would likely increase harvest on Chignik stocks. As an alternative, we ask that the Board to consider non-retention of Chinook across all CMA fisheries. Recent Area M research using satellite pop-up tags (PSATs) on released seine-caught Chinook shows promising survival and migration results: tagged fish either were eaten by predators, returned to natal streams, were later caught in sport fisheries, or were harvested outside the South Peninsula. Expanding similar research in CMA districts would inform management while minimizing impacts to vulnerable Chinook stocks.



Figure 4. Photo of pop-up tag on Chinook from research project conducted by UAF Ph.D. student.

Proposal 116 OPPOSE – 5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Amend the Northern District Salmon Fisheries Management Plan to decrease commercial salmon fishing time and area to drift gillnet gear

This proposal seeks to reduce fishing time by implementing new closures of 96 hours in each 7-day period in the Bear River, Three Hills, Ilnik, and Outer Port Heiden sections of the North Peninsula from June 20 and July 20. The proposer’s stated claim is that river systems south of Cape Seniavin “are not, or struggle, to achieve escapement goals.” A review of escapement data does not show any stocks of concern on the North Peninsula.

Table 13 (below) from ADFG’s 2025 Alaska Peninsula and Aleutian Islands Salmon Season Summary lists all sockeye escapements for Nelson, Ilnik, and Bear Lake early and late run and they are all within or above recommended goals. In fact, Nelson River had an over-escapement of nearly three times the upper goal – 552,224. The Nelson Lagoon section had a harvest of 230,080 sockeye in 2025. Implementing additional harvest restrictions as proposed is not necessary and could prove detrimental considering harvest effort has continued to decrease at Nelson Lagoon.

	Escapement ^a	Goal
Nelson (Sapsuk) River	552,224	97,000–219,000
Ilnik River	40,810	40,000–75,000
Bear Lake early run	212,355	176,000–293,000
Bear Lake late run	126,401	117,000–195,000
Bear Lake total	338,756	293,000–488,000
Subtotal for systems with weirs	931,790	430,000–782,000
Subtotal for systems without weirs	138,155	125,400–257,800
Northern District total	1,069,945	555,400–1,039,800

^a Includes an estimate of sockeye salmon after removal of the weirs.

Figure 5. Northern district escapement goals and escapements for 2025. Source ADF&G.

Proposal 120 OPPOSE – 5 AAC 09.330. Gear 5 AAC 09.360 Southeastern District Mainland Salmon Management Plan Amend the Southeastern District Mainland Salmon Management Plan to reduce fishing time and area for purse seine gear.

Chignik sockeye met its escapement goal in 5 of the last 5 years, and in 2025, Chignik seiners harvested 830,000 Chignik sockeye. Catch plus escapement in 2025 was 1.8 million sockeye salmon under the current CMA management plan. This is not a stock that requires ratcheting harvest back in SEDM. If anything, restrictions on SEDM should be

relieved and time and area increased. In 2025, the OEG was surpassed by a quarter million fish, a significant loss of value. The relatively small commercial fleet in Chignik is not capable of harvesting runs over 1.5 million sockeye.

Species	Count For 09-30-2025	2025	2024	2023	2022	2021	2020	2019	2018	2017	2016
Chignik River: Weir removed 8/28.											
Sockeye	-	1,007,247	696,559	851,295	808,086	640,941	330,975	681,999	539,698	792,561	773,175
Late Run Sockeye	-	528,377	322,768	429,302	383,606	396,559	193,762	336,081	275,719	339,304	351,885
Chinook	-	1,391	1,166	267	761	1,172	1,278	1,517	825	1,137	1,843

Figure 6. The combined optimal escapement goal (OEG) for Chignik sockeye is 540,000 to 760,000 salmon. This has been surpassed in 3 of the past 5 years.

Catch Area	Chinook	Sockeye	Coho	Pink	Chum
Chignik Bay	25	520,895	3,656	222,650	10,251
Central	751	97,189	6,888	218,208	13,962
Eastern	22	4,103	644	281,430	4,727
Western	900	208,379	27,572	884,944	45,797
Perryville**	Confidential	Confidential	Confidential	Confidential	Confidential
	1,698	830,566	38,760	1,607,232	74,737

Figure 7. Commercial purse seine harvest by area shows the majority of sockeye caught in Chignik Bay followed by the Western district.

This proposal, if implemented in 2025, would likely not have resulted in more sockeye being harvested in these districts. Instead, the likely result would have been additional overescapement. Sockeye lakes can be very sensitive to overescapement, which can drive down secondary productivity resulting in negative consequences for the sockeye population over multiple generations.⁸

Proposal 126 OPPOSE – 5 AAC 09.200. Description of districts and sections. 5 AAC 09.360. Southeastern District Mainland Salmon Management Plan. 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Amend regulatory language to reduce commercial salmon fishing time and area by incorporating the Volcano Bay Section of the Southwestern District into the South-Central District, and include the Volcano Bay, East and West Pavlof Bay Sections in the and Southeastern District Mainland Salmon Management Plan

This proposal requests rolling back the management plan 21 years to disallow purse seining in June in Volcano Bay, and the East and West Pavlof Bay Sections in SEDM. Currently, Chignik sockeye has had the highest escapement and harvest in ten years. The proposal erroneously states that “Chignik stocks are struggling....” and further states that without the regulatory change, there will otherwise be an overharvest of Chignik sockeye. The two tables above in Proposal 120 show quite the contrary. The current SEDM management plan has been working for two decades. It has proven to not preclude OEG sockeye escapements to Chignik as well as provide significant harvest opportunities for the Chignik fleet. The data speaks for itself, and it says this proposal is wholly unwarranted.

⁸Koenings J., et.al. 1997. Chinook salmon depth distributions on the continental shelf are shaped by interactions between location, season, and individual condition. <https://www.adfg.alaska.gov/fedaidpdfs/AFRB.04.2.120-135.pdf>

WASSIP provides a snapshot of June and July harvests in SEDM, which demonstrates that the majority of Chignik sockeye are not caught in the SEDM June/July fisheries. Instead, sockeye salmon move through the SEDM and are primarily caught in the Western and Chignik Bay districts. There is a long history of regulatory changes to protect Chignik sockeye, including recent ones cited by ADFG:

“During the February 2016 Alaska Peninsula, Aleutian Islands, and Chignik meeting, the board made changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5AAC 09.365) and the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366) by adopting regulations to limit the number of sockeye salmon harvested in the Western Alaska Salmon Stock Identification Program (WASSIP) described “Dolgoi Island Area” (statistical areas 283-15 through 283-26 and 284-36 through 284-42; Figure 150-1). From June 1 through July 25, when harvest reaches 191,000 sockeye salmon by fish ticket information, the portion of the West Pavlof Bay Section south of Black Point (statistical area 283- 26) and waters of Volcano Bay Section (statistical areas 284-37 through 284-39) close to commercial salmon fishing through July 25.”

Further changes to benefit Chignik sockeye are not needed based on long standing Board of Fisheries and ADFG policies for delisting stocks of concern.

Proposals 127, 128, 129, 130, 131, 132, 133, and 136, OPPOSE – 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. These proposals are nearly identical and seek to repeal the current South Unimak and Shumagin Islands June Salmon Management plan and replace it with draconian reductions in fishing time that would essentially eliminate the June purse seine fishery. The summary of modifications and proposer’s reasoning for these proposals:

Proposal 127 – **Ten-day closure ~June 10 – 23.** Reasoning: interception of Chinook and chum in Area M is the only cause cited for declines in Yukon, Kuskokwim, Unalakleet, and Nushagak chum and chinook.

Proposal 128 – **At least ten-day closure** at peak of June sockeye, unspecified dates. Reasoning: “bycatch” of Chinook, chum, and coho in Area M June fishery and decline of these species on Koyukuk River.

Proposal 129 – **Ten-day closure June 10 – 20;** chum thresholds of 300,00 by June 23 and 450,000 by June 23 result in time reduction or closure, respectively. Reasoning: Reduce harvest of Norton Sound chum, due to decline of Norton Sound chum from 2018 to 2023.

Proposal 130 – **Open on June 10 for 66 hours,** 78-hour closure, 66-hour opening, 78-hour closure, final opening 66 hours, close season June 24, for a **total June opening hours of 198 hours.** Reasoning: longer closures provide windows to pass fish to Chignik.

Proposal 131 – **12-day closure June 12-23.** Reasoning: Reduce AYK chum and Chinook interception in Area M.

Proposal 132 – **Four openings during June 10-13, 16-18, 24-28 & 26-28. Total 262 hours open.** Reasoning: Reduce “bycatch” of CWAK chum.

Proposal 133 – Manage Shumagin and Unimak on discrete schedules, less fishing time for **Shumagin (198 hours)** than **Unimak (240 hours)**. Reasoning: Increase Chignik sockeye passage and CWAK chum passage to AYK.

Proposal 136 – **Close to fishing June 7-28.** Reasoning: Increase passage of CWAK chum and Chignik sockeye.

Reductions in Time and Area Taken by the Board of Fisheries 2018-2014⁹

Year	Action taken
2018	Reduce commercial fishing periods for all gear types throughout the entire South Alaska Peninsula during fishing periods that began on June 22 and June 27.
2019	Seine gear removed from "Dolgoi Island area" in regulation at BOF meeting. Fishery windows aligned for all gear types.
2020	Closed "Dolgoi area" on June 13. Reduced fishing time in Shumagin Island Section of the Southeastern District to 40 hours for all gear types on June 20 and June 25.
2021	No actions taken.
2022	Reduced fishing time in the Shumagin Island Section of the Southeastern District to 40 hours for purse seine gear only on June 15, June 20, and June 25.
2023	Regulatory change at to purse seine gear scheduled fishing periods and adoption of management action plan that follows RC104 agreement at February 2023 BOF meeting. Reduce fishing time by 50% in the Shumagin Islands Section for purse seine gear only on June 16 and June 20.
2024	Reduce fishing time by 50% in the Shumagin Islands Section for purse seine gear only on June 16, June 20, and June 25.
2025	No actions taken.

Figure 8. Significant time and area restrictions have been added in regulation since 2018. In addition, Sanak Island is closed during the June fishery. In combination with the Adaptive Management Plan chum harvest has declined significantly

We acknowledge that parts of Interior Alaska are suffering from low chum and Chinook salmon productivity, but not for the reason stated in these proposals. Small numbers of CWAK salmon are harvested in Area M fisheries, but this small harvest is not the primary or even tertiary level effect. These proposals unfortunately repeat tired rhetoric and falsehoods about the Area M fishery without doing any independent research or scientific analysis. A few individuals who are bent on destroying the Area M commercial fishery have succeeded in convincing various Native organizations and committees to parrot untrue and unverified assumptions blaming the Area M fishery for the decline of CWAK chum salmon stocks.

Two recent reports, one by Yukon River Drainage Fisheries Association (YRDFa) and another commissioned by the Canadian government concur on the deleterious factors and risk analyses driving chum and chinook productivity decline from the mouth of the Yukon River to the headwaters. YRDFa at its 2025 Annual Pre-Season Meeting¹⁰ identified threats to salmon and their way of life. The summary of natural threats includes predation by pike and bears, invasive species, disease and parasites, melting permafrost, beaver dams, and water temperatures, aligning closely with much of the published western science (footnoted and discussed below in this document). The YRDFa document also

⁹ ADF&G Staff Comments RC-2 February Board of Fisheries Alaska Peninsula Meeting 2025. RIR Report No.5J26-01

¹⁰Yukon River Drainage Fisheries Association, 2025 Annual Pre-Season Meeting Report RC018 – Ocean Threats, Management Threats, Natural Threats, Human Threats

closely aligns with the risk analysis to salmon in the Canadian technical report. Murdoch et al. 2025,¹¹ state in the abstract:

“Yukon River Chinook face multiple high-risk threats throughout their life cycle. Freshwater risks are greatest during adult migration and spawning, with elevated temperatures and *Ichthyophonus* infections potentially causing 'carry-over' effects on egg and alevin survival. Marine risks include warming ocean temperatures and prey shifts during the maturing adult stage, as well as predation during the early marine stage.”

These documents from YR DFA and Canada DFO (Department of Fisheries and Oceans) do reference Area M but they are not shown to be the highest-level risks facing salmon – the highest risks identified are high water temperatures, fitness reduction, *Ichthyophonus*, migration barriers due to freshwater temperatures, wild pink salmon competition, and marine predators. The DFO analyses identify commercial fishing pressure as low risk. Many empirical studies specific to the Yukon and Interior Alaska will be reviewed further in the document.

It needs to be acknowledged what the WASSIP data in 2007-2009 and again in 2022, 2023-2024 demonstrated, which is that the June fishery CWAK harvest rate mean values were 4.2% and 5.5% for those years, respectively. In 2023, the actual number of June CWAK chum harvest was 58,888, a portion of which were CWAK Bristol Bay, Kuskokwim, Yukon, and Norton Sound fish. It is not currently possible to determine how many of the CWAK chum caught in the June fishery were destined for each of those four systems, but a reasonable assumption is that it is proportional to the magnitude of each of the four CWAK systems. The Yukon and Bristol Bay chum runs are the largest of the four systems, representing approximately 70% of the total in 2022. Therefore, it is reasonable to estimate that half, or 20,000, of those chum were migrating to the Yukon region. What this demonstrates is that the Area M fishery has a small impact on CWAK chum. Most importantly, this number of chum caught in the June fishery does not explain the low chum escapements observed on the Yukon in 2000-2001 and 2021-2022. While the Area M June fishery was prosecuted under the current management plan from 2004 to 2025, other than the years mentioned herein, the Yukon met or far exceeded the established escapement goals for twenty of those years. In addition, since 2022, Area M commercial seine fishermen have used the Adaptive Management strategy endorsed by the Board at its February 2023 meeting to use real-time fishery data to move off chum hotspots while targeting sockeye. This innovative approach has decreased chum harvest in June with 100% fleet compliance to cease fishing in areas showing high chum abundance.

New scientific studies document the vectors of climate change that are the true drivers of poor chum and Chinook productivity in the Yukon. These vectors include:

- Lethal spawning temperatures (18⁰C)
- Spread of *Ichthyophonus* spp.
- Severe marine warming events
- Permafrost melt releasing sequestered heavy metals (cadmium, iron, and aluminum) in at least 75 interior streams and rivers creating toxicity and extreme low pH levels
- Dramatic increases in marine predators (killer whales, salmon sharks, and pinnipeds) that remove older age and larger fish

¹¹ Murdoch, A., et al. 2025 Multiple environmental drivers across life stages influence Yukon River Chinook salmon productivity. Canadian Technical Report of Fisheries and Aquatic Sciences 3717

- Ice sheet retreat that lowers productivity of the Eastern Bering Sea while favoring the Asian stocks of pink and chum salmon in the Western Bering.

These factors are rooted in empirical science and are the key reasons for poor chum and Chinook survival in AYK river systems. Draconian cuts to the Area M June fishery will not change the unfortunate climate realities of Interior Alaska but will devastate the isolated Native communities of the Aleutians East Borough that rely upon local fisheries.

Economic Impact on Eastern Aleutian Communities

The economy and culture of the South Peninsula depend on fishing for its survival. Aleutians East Borough (AEB) has a population of 3,600 and encompasses the communities of Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon, and Sand Point, and includes the Native communities and tribes of Belkofski, Unga, False Pass, Agdaagux, Pauloff Harbor, and Qagan Tayagungin.

AEB is critically dependent on the fishing industry for infrastructure, roads, schools, and taxes to help pay for it. AEB and Alaska State residents comprise 70% of the Area M permits fished each season. Few other Alaska communities have this rate of participation. Implementing any of the proposals to reduce time and area in the Area M June fishery would economically harm local residents in profound ways. Also, for all the reasons delineated in the empirical evidence, it will not change the issues confronting the Yukon that climate change has wrought.

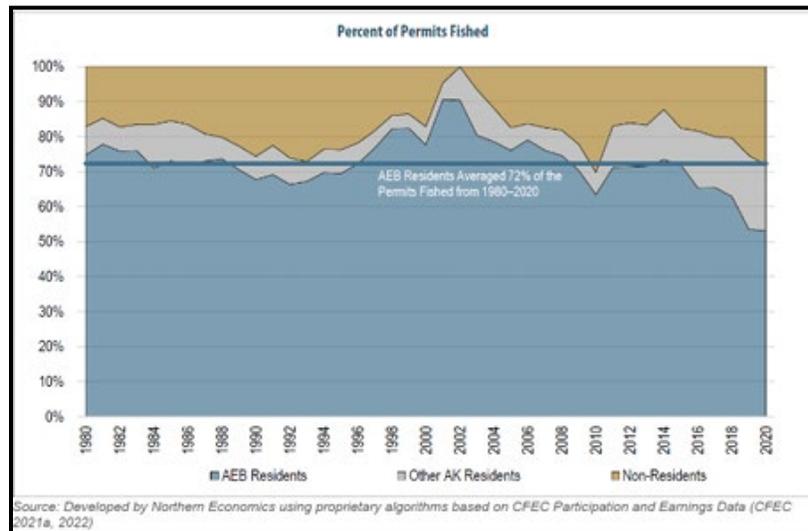


Figure 9. CFEC permits fished in Area M by AEB residents, Alaska residents and non-residents

Adaptive Management Program

Hearing the concern for chum salmon on the Yukon River, the June Area M Adaptive Management Program was created and tested in 2022 to voluntarily reduce chum harvest. The program was then implemented and endorsed by the Board (RC104)¹² at its February 2023 Alaska Peninsula meeting. The program has proven effective at reducing chum harvest as exemplified by the 2023 – 2025 June harvest numbers: 221,609, 276,577, & 156,136, with a three-year average

¹² RC104 https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/peninsula/rcs/RC104_Kiley%20Thompson_Area%20M%20Draft%20Plan%20Revision%203.pdf

of 218,107, whereas the ten-year average is 503,595.¹³ This is a 57% reduction of chum.

The adaptive management program is effective because there is 100% fishermen participation, processors enforce compliance rules, and satellite and phone app communications are used by all and conducted in real time. Therefore, decisions to stand down from fishing in specific areas due to high densities of chum salmon are immediate and conveyed to all fishermen, and ADFG. The full scope of the adaptive management plan can be seen in RC104 from the 2023 meeting cited above. In summary, fishermen elect a board of active fishermen that manage & communicate with a subset of the 49 permit holders fishing in 2025. The leader gets input on harvest composition by time and area; if chum densities are deemed too high, they call a “stand down” that is communicated to the entire fleet. In some cases, fishing may continue in other areas where sockeye are abundant and chum numbers low. All fishermen pool their June chum catches at their processor so there is no incentive to catch more chum for the pool. Fishermen sacrifice significant fishing time due to stand downs, beyond the regulation-mandated closures. One important aspect of this program is that it requires sufficient time and area to make it work. To target sockeye and move off non-target chum, fishermen need time to travel to another area to fish. Chum do not concentrate in the same area or time of day; they are constantly moving. Restricting either time or area will negate program effectiveness and likely result in greater chum catch not less.

In addition to the adaptive management program, in 2023 the Board closed the Sanak Island section 285-10, a known chum hotspot; introduced triggers for closing the fishery (neither of which have been activated by ADFG during the three years of the regulation); and reduced fishing time from 352 hours to 310 hours. This last action does not include the voluntary stand-down hours. It is estimated that there is 25% to 30% loss of opportunity to the seine fleet for their voluntary actions. This innovative program is a testament to Alaska fishermen, processors, and ADFG management working toward a common goal that has proven effective.

There is a natural experiment regarding the effect of Area M on CWAK stocks. The closest CWAK stocks to Area M are the Bristol Bay (Nushagak) and Kuskokwim systems, both of which conducted harvests of chum and surpassed their chum escapement goals in 2025. In fact, the Nushagak River chum salmon (CWAK) in-river run index at Portage Creek sonar was 368,817 fish, well above the lower bound for the sustainable escapement goal of 200,000 fish.¹⁴ CWAK chum harvest in the Nushagak drift net fishery was 309,902 in 2025. Naknek, Egegik, Ugashik, and Togiak in aggregate saw another 260,000 CWAK chum harvested in drift net fisheries in 2025. The Bristol Bay total CWAK chum escapement plus harvest in 2025 was nearly a million fish. In contrast to the Yukon, Nushagak and Bristol Bay are pristine systems that have few if any of climate-driven freshwater or disease issues the Yukon is experiencing. Given the nature of the Bristol Bay drift net fishery in open bays and headlands, some of these harvested CWAK chum were undoubtedly headed for the Kuskokwim and Yukon Rivers.

The Kuskokwim river systems in 2025 also had good returns of CWAK chum and Chinook. The Kuskokwim River escapement was 159,622. The Kogruklu River, a tributary of the Kuskokwim had an escapement of 29,426 well within the SEG of 15,000 to 49,000 chum. Subsistence harvest was reported by Kuskokwim Inter-Tribal Fish Commission

¹³ <http://www.adfg.alaska.gov/static/applications/dfnewsrelease/1744698737.pdf>. 2025 ADF&G Alaska Peninsula Season Summary, Page 5.

¹⁴ <https://www.adfg.alaska.gov/static/applications/dfnewsrelease/1738640423.pdf>

at 92,000 chum between Tuluksak and Tuntutuliak.¹⁵ Drift gillnet harvest in Bristol Bay, subsistence harvest on the Kuskokwim, and escapements at both locations demonstrate healthy returns that are meeting sustainable goals and harvest needs alike. It makes little logical or scientific sense that the Area M June fishery is the primary driver of the Yukon River’s low productivity when the same fishery is apparently not having a similar impact on Bristol Bay and Kuskokwim returns. One major difference between the Kuskokwim and the Yukon is the mountain ranges within their respective watersheds. The Kuskokwim is fed by the north side of the Alaska Range where snowmelt is prolific during the warm months, whereas the Yukon is fed by lesser mountains ranges with little snowmelt in July and August. These differences manifest in terms of disease, lethal high temperatures, permafrost loss, and habitat changes in the face of a warming climate.

Kuskokwim Area Weir-Based Escapement Goals and 2025 Escapements				
Chinook				
Project	Goal Type	Start Year	Goal	2025 Escapement
George River Escapement	SEG	2013	1800 - 3300	1,925
Kogrukluk River Escapement	SEG	2013	4800 - 8800	9,462
Kwethluk River Escapement	SEG	2013	4100 - 7500	120,492
Chum				
Project	Goal Type	Start Year	Goal	2025 Escapement
Kogrukluk River Escapement	SEG	2005	15000 - 49000	159,622

Figure 10. Kuskokwim Area escapement goals for Chinook and chum, and escapements for 2025. Note chum escapement on the Kogrukluk River was 3X of the upper range goal of 49,000. Data from ADF&G

Chum Genetic Stock Analysis: WASSIP 2007-2009, Chum GSA 2022-2024, and 2025

¹⁵ <https://www.kuskosalmon.org/news/2025-prelim-summary#:~:text=Based%20on%20information%20gathered%20through%20the%20Community%2DBased,open%20for%20fishing%20outside%20of%20announced%20opportunities.>

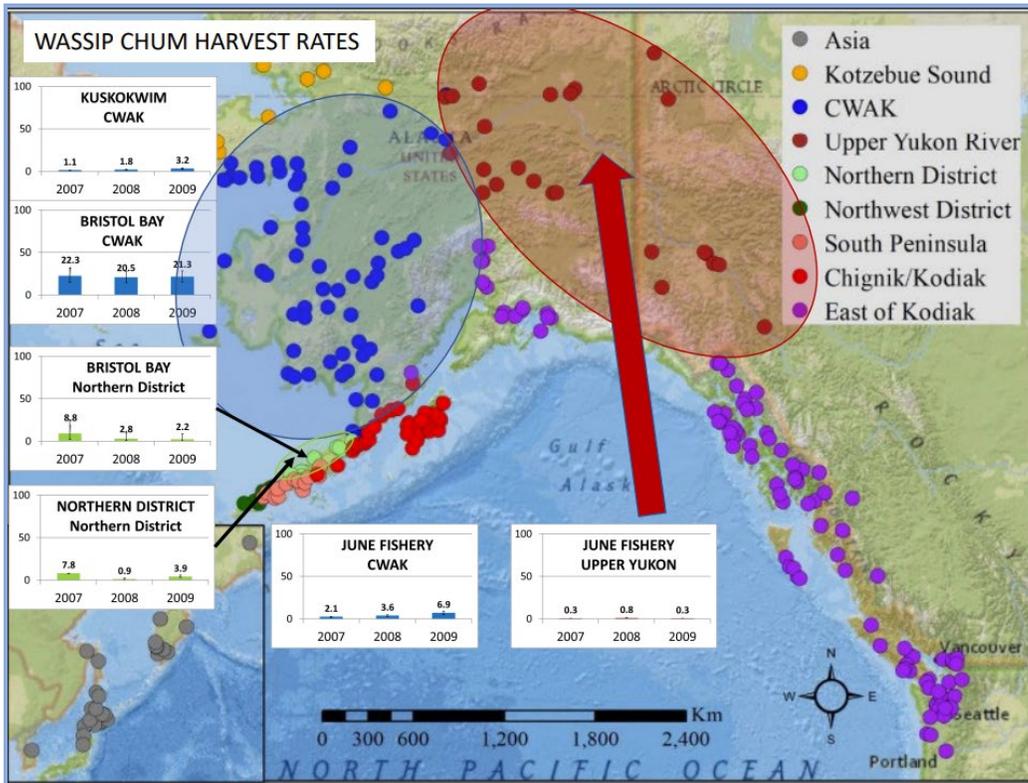


Figure 11. WASSIP harvest rates for CWAK and Fall Yukon chum in Area M fisheries for years 2007-2009. Bristol Bay harvest rates for CWAK included, ranging from 20.5% to 22.3%. The CWAK stocks are spread broadly (shown as blue dots) from Bristol Bay to Norton Sound, a shoreline distance of over 850 miles.

The best available genetic science (WASSIP)¹⁶ and more recently the 2022 - 2024 chum genetic stock analysis¹⁷ does not support these proposals' assertions that the Area M June fishery is the primary or even a significant cause of AYK chum and Chinook declines. The 2007-2009 WASSIP¹⁸ genetic stock analyses calculated harvest rates on CWAK stock to be very low (mean 5.5%), and the 2022-2024 chum studies demonstrate that the majority of chum caught in the Area M June fishery are of Japanese, Russian, B.C., Washington, and lesser origin stocks totaling 75.7%. CWAK harvest with a mean June harvest of 24.3% is spread among Bristol Bay, Kuskokwim, Yukon summer, and Norton Sound river systems and every chum stream in-between along the 850 mile coastline.

Some of the most significant changes from the WASSIP years 2007-2009 compared to the 2022-2024 Alaska Peninsula report is the increase of chum in the June fishery from Russia and Japan. The proportion of CWAK chum has declined from an average of 57% to 24% in the study periods. The 2022-2024 study shows the CWAK June harvest range of 58,779 to 119,922 with the CWAK percentages ranging from 17.5% to 28.6%, a three-year average of 24.3%. In 2025, the June fishery had the lowest chum harvest since 2001 when there was a fisheries strike. The 156,136 harvested in 2025 is in no small part due to the adaptive management program and fishermen's dedication to reducing chum harvest.

¹⁶ WASSIP 2007-2009 <https://www.adfg.alaska.gov/FedAidpdfs/sp12-25.pdf>

¹⁷ ADF&G Genetic Stock Composition of Chum Salmon Harvested in Commercial Salmon Fisheries of the South Alaska Peninsula, 2022-2024 Dann, T., et al. 2025

¹⁸ WASSIP 2007-2009 <https://www.adfg.alaska.gov/FedAidpdfs/sp12-25.pdf>

AREA M HARVESTS 2022-2025 with CWAK PROPORTIONS						
Year	Total Run CWAK est.	Area M June Chum Harvest	CWAK% ¹	CWAK No.	Harvest Rate	
2022	1,136,083	544,097	17.5%		95,217	5.5% ²
2023	1,709,906	205,522	28.6%		58,779	3.4% ³
2024	2,023,831	450,834	26.6%		119,922	5.9% ³
2025	1,636,732	156,136	based on average		37,941	2.3% ³
Calculated averages			24.3%		77,965	

¹Percent of total June chum harvest that is CWAK gene type
²Harvest rate by ADF&G
³Harvest rates calculated from ADF&G harvest and escapement data

Figure 12. Area M harvests 2022-2025. Based on CWAK harvest averages 2022-2024 of 24.3% the 2025 June CWAK harvest is likely to be about 38,000 chum spread over Bristol Bay to Norton Sound stocks. Column 2 is estimated total run of CWAK (Bristol Bay, Kuskokwim, Yukon, & Norton Sound) from ADF&G, Kuskokwim Tribal, or YRDFa reporting. These are likely minimum total runs due to incomplete reporting.

It is unfortunate that the years 2020-2021 were not captured in the latest Alaska Peninsula genetics work. All CWAK stocks from Bristol Bay to Norton Sound were struggling and relatively low. If sampling would have been done, it is likely that CWAK stocks would have been poorly represented in the June fishery due to their low presence in escapement counts. Indeed, there is no evidence that AYK chum declines in 2020 – 2021 were driven by the Area M June fishery. However, there is good evidence that the severe marine warming events of 2016 – 2019 were the main driver of those historically low CWAK returns. Looking at the historical AYK escapement and harvest of the past thirty years, there is no cause-and-effect or even correlation between current Area M regulations (2004 – 2025) and AYK chum productivity (harvest plus escapement). The historical record of Yukon River escapements, which has a total drainage-wide summer run BEG range of 500,000 to 1.2 million, is informative regarding these proposals. In the past three decades only five years out of 30 years has the lower escapement bound not been met – 2000, 2001, 2021, 2022, and 2025. Conversely, under the current South Peninsula management plan, escapements of two to three million Yukon CWAK chum runs have observed in 2005, 2006, 2012, 2013, 2014, and 2017, all years Area M management plan was like today’s plan. One constant is that salmon run strength throughout Alaska is cyclical by nature and cannot be defined by a two- or three-year term.

The ocean research by NOAA Fisheries and International Year of the Salmon (IYS) predicted the poor CWAK chum and Chinook survivals of 2020 and 2021 based on widespread Bering Sea and North Pacific Ocean chum and Chinook samples of skinny, low lipid content and poor condition subadults from 2017-2019. During this period, a hot marine environment showed decreased secondary productivity (prey for salmonids) while increasing the energy demands of salmon. This resulted in a calamitous survival event for CWAK stocks. The 2021 historically low return of 153,718 itself would predict a smaller surviving cohort return four years later in 2025, which is exactly what was observed.

Totals to Date for Pilot Station Sonar Chum Salmon - Summer Run																				
*Pilot Station Escapement uses 90% confidence intervals. Other projects use 95% confidence intervals.																				
	1997	1997	1998	1998	1999	1999	2000	2000	2001	2001	2002	2002	2003	2003	2004	2004	2005	2005		
Season	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Totals	
	1,359,117	65,162	824,901	64,599	969,459	77,802	448,665	23,679	442,546	24,208	1,097,769	51,097	1,183,009	60,649	1,344,213	49,946	2,570,696	78,640		
	2006	2006	2007	2007	2008	2008	2009	2009	2010	2010	2011	2011	2012	2012	2013	2013	2014	2014	2015	2015
	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*
	3,780,760	155,452	1,875,491	74,394	1,849,553	68,542	1,477,186	69,895	1,423,372	89,356	2,051,501	77,486	2,136,476	79,036	2,849,683	114,602	2,020,309	98,909	1,591,505	98,413
	2016	2016	2017	2017	2018	2018	2019	2019	2020	2020	2021	2021	2022	2022	2023	2023	2024	2024	2025	2025
	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*
	1,921,748	86,055	3,093,735	157,439	1,612,688	107,348	1,402,925	85,902	692,602	36,325	153,718	16,149	437,032	24,286	845,988	35,973	758,260	38,248	347,146	21,120

Escapement goal met
Below escapement goal

Table 13. Yukon River escapements from 1997 to 2025. Blue connotes within or above escapement goal, Orange connotes below lower bound of escapement goal¹⁹ Most escapements in the past 30 years were over the upper bound or within the bounds (25 years), only 5 below the BEG

There is no obvious connection between either low or high Yukon chum escapements and the Area M June chum harvest. A review of Pilot Station escapement counts in Table 12 above is also informative. During the 2001-2003 period, under a draconian South Peninsula management plan which was essentially a version of proposals 127-133 & 136, the Yukon River escapement in 2001 was 442,546 (below lower bound) while the Area M June harvest was only 49,027 chum due to fishermen’s strike. Based on WASSIP we know that only a small portion of these chum were bound for the Yukon. Contrast that with escapements from 2003 to 2019, a seventeen-year period with Yukon escapements all within

**YUKON RIVER ESCAPEMENT VS AREA M
CHUM HARVEST 2003 - 2019**

Year	Escapement	Chum Harvest June Area M
2003	1,183,009	282,384
2004	1,344,213	482,310
2005	2,570,696	428,664
2006	3,780,760	300,526
2007	1,875,491	297,539
2008	1,849,553	410,932
2009	1,477,186	696,775
2010	1,423,372	273,610
2011	2,051,501	423,335
2012	2,136,476	397,197
2013	2,849,683	399,417
2014	2,020,309	390,139
2015	1,591,505	178,715
2016	1,921,748	272,795
2017	3,093,735	641,215
2018	1,612,688	537,974
2019	1,402,925	549,072
Average	2,010,874	409,565

¹⁹ https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareayukon.salmon_escapement
Page 21 of 40 Area M Seiners Association Comments to BOF, February 18-24, 2026

Figure 14. Chum escapements at Pilot Station and Area M June chum harvest. If there were a cause and effect of June chum harvest in Area M and poor Yukon escapement it would likely appear in this table.

bounds or well over the upper escapement bounds. Seven of these years (2005, 2006, 2011-2014, and 2017) had two to over three million chum escapements. During this same period chum harvest in the Area M June fishery from 2003 to 2019 was on average 409,565 chum.

Figure 14 shows chum harvest versus Pilot Station escapements in the same year. Based on WASSIP data we know that the Area M chum harvest has a high proportion of Asian chum and only a small proportion is bound for the four CWAK regions. Therefore, it is difficult to read too much from catch vs. escapement, but these seventeen years demonstrate that even with above-average chum harvests in Area M, the Yukon was highly productive in many years. For example, in 2009 an escapement of 1.47 million yielded a massive four-year-old return in 2013 of 2.85 million chum. This exemplifies what ADFG noted in a 2015 report that the annual Yukon summer chum run has natural cycles of high and low abundance over the long term.²⁰

This is strong evidence that the Area M June fishery is not the cause of recently observed low returns of Yukon chum. If Area M June chum harvest was the driver for CWAK chum survival, then Bristol Bay, Kuskokwim and the Yukon would rarely meet escapement. As pointed out earlier, Bristol Bay and Kuskokwim had relatively good chum returns in 2025. Clearly, the Yukon River system is under duress from non-fishery factors.

²⁰ ADF&G, FMS 15-07 at p. 15 (2015) [<https://www.adfg.alaska.gov/fedaidpdfs/fms15-07.pdf>]

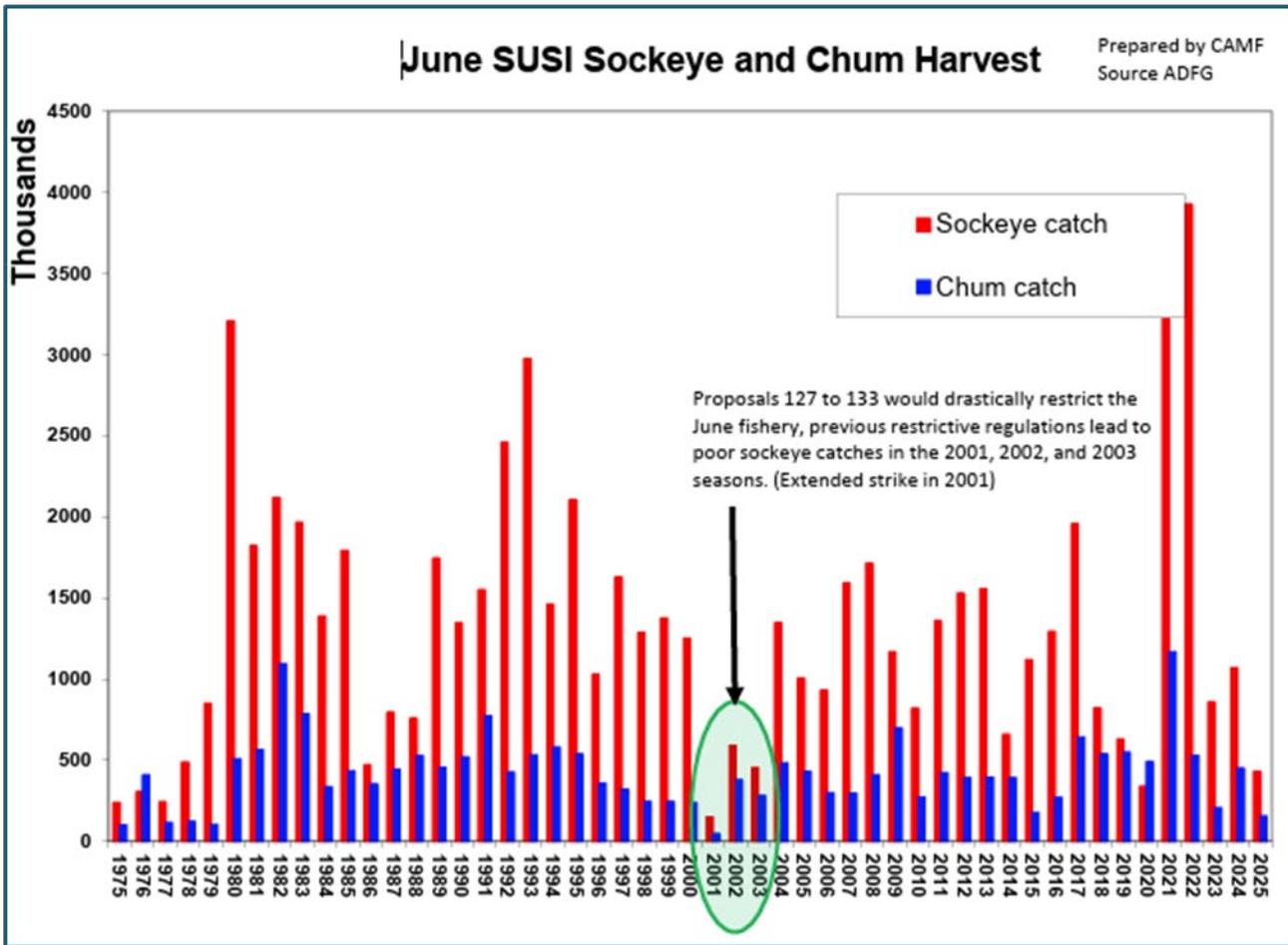


Figure 15. Area M June catch of chum and sockeye from 1975 – 2025. Harvest in 2001 was a fisheries strike year, while 2002 & 2003 show low sockeye harvests but near average chum harvests

Scientific Literature Review of Climate Drivers Impacting Yukon Chum and Chinook Production

The Yukon faces serious challenges not due to the Area M fishery, but because of climate-driven changes to the freshwater environment, ice sheet retreat, marine heat waves, and dramatic population growth of marine predators. Research in the past decade sheds considerable light on these changes which collectively demonstrate why chum and Chinook are facing productivity declines on the Yukon.

1. Lethal spawning temperatures

von Biela et.al. (2020)²¹ describes, in *Evidence of prevalent heat stress in Yukon River Chinook salmon*, with three major clear conclusions: (1) water temperatures around 18°C approximate a threshold for heat stress in adult Chinook during the spawning period; (2) summer water temperatures routinely exceeded that threshold each July in the Yukon River over the last two decades; and (3) molecular indicators—gene transcription patterns and protein

²¹ von Biela, V. R., Bowen, L., McCormick, S. D., Carey, M. P., Donnelly, D. S., Waters, S., Regish, A. M., Laske, S. M., Brown, R. J., & Larson, S. (2020). Evidence of prevalent heat stress in Yukon River Chinook salmon.

expression—demonstrate widespread physiological heat stress in the surviving fish. Chum salmon encountered the same spawning environment during the same time period.

Von Finster, A. et al. (2024)²², in their study *Multiple environmental drivers across life stages influence Yukon River Chinook salmon productivity*, corroborate von Biela's findings further up the Yukon River in Canada. Using a multi-stage analysis, they show that positive drivers of Yukon Chinook productivity include robust snowpack and cooler winter freshwater temperatures, while the strongest negative influences are wetter rearing-season precipitation, warmer upriver temperatures, accumulated rearing degree-days, and earlier ice-out. Together with von Biela's physiological and molecular evidence of heat stress, Murdoch et al. strengthen the conclusion that freshwater thermal and hydrological changes are primary drivers of the severe productivity declines in Yukon River Chinook and chum. Likewise, Howard et al., in a recent study report a range of effects in both spawning and rearing areas, including warmer summer temperatures that can reduce embryo and juvenile survival, promote earlier fry emergence and smolt outmigration which increase the risk of mismatches with ocean prey.²³

2. Permafrost melting and release of sequestered heavy metals

Interior Alaska permafrost melting may be one of the most visually dramatic and ecologically significant changes occurring in the Arctic. Sullivan et al. (2025)²⁴ and O'Donnell et al., (2024)²⁵ identified some 75 streams south of the Brooks Range that discharge large plumes of orange-rust colored water into tributaries of the Yukon. These plumes contain elevated concentrations of dissolved iron, cadmium, aluminum, SO₄: Cadmium, characterized by very low pH. Sulfate (SO₄⁻²) can be reduced and subsequently produce sulfuric acid, increasing acidity and mobilizing metals that were previously sequestered in permafrost. These naturally occurring contaminants now flow hundreds of miles down the Yukon and other rivers to the ocean. The toxins and metals exceed EPA thresholds by substantial multiples. Fish populations, algae, zooplankton and insects have been negatively affected, and the authors suggest this phenomenon may be linked to the decline of regional chum and chinook salmon populations.

²²von Finster, A Murdoch, A., B.M. Connorsc, N.W.R. Lapointed, J. Mills Flemminge, S.J. Cookea, and C. Mantyka-Pringleb, *Multiple environmental drivers across life stages influence Yukon River Chinook salmon productivity* 2024.

²³Howard, K. G., Dubois, L., & Falke, J. A. (2015). *Assessing the thermal resilience of Alaska's Chinook salmon populations*

²⁴ Sullivan P., Dial R., Cooper D., Diamond C., Tino C., Gregory D., and Lyons T. (2025) *Wild, scenic, and toxic: Recent degradation of an iconic Arctic watershed with permafrost thaw.*

²⁵ O'Donnell J. et al., (2024). *Metal mobilization from thawing permafrost to aquatic ecosystems is driving rusting of Arctic streams.*



Figure 16. An aerial view of the Kutuk River in Alaska's Gates of the Arctic National Park that looks like orange paint spilling into clear blue water (Ken Hill National Park Service). Some 75 rivers have been identified with similar conditions. Cadmium, iron, aluminum create color and extremely low pH.

Together, these findings underscore that both changing biotic interactions and large-scale hydrological shifts driven by climate can indirectly and directly affect chum and Chinook growth, survival, and productivity.

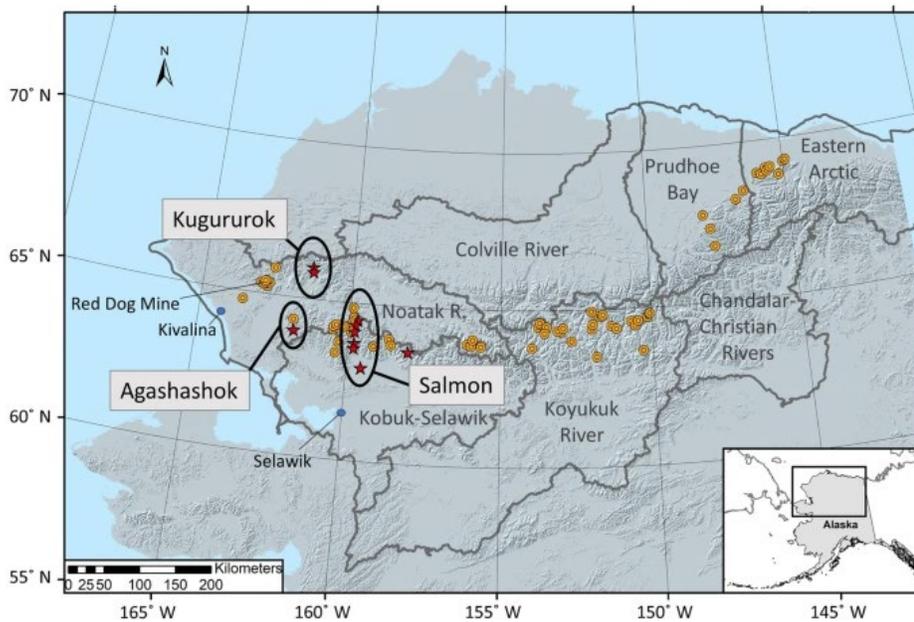


Figure 17. Orange circles indicate orange stream observations, red stars indicate sites where the water samples were collected, and blue circles are nearby villages. Hydrologic Unit Code-6 (HUC) basins are shown as black outlines from the National Watershed Boundary dataset. The hill-shade layer utilizes the USGS National Elevation Dataset. Map generated in Esri ArcMap software. Map credit: Kenneth Hill, NPS.

3. Predators – Salmon sharks, killer whales, pinnipeds

Predation plays a major role in Chinook salmon survival and population dynamics throughout their life

cycle.^{26,27,28} The "critical size and period" hypothesis holds that growth and condition in the initial marine months strongly determine cohort survival: fish that reach a larger size by the end of their first summer have higher overwinter survival and greater chances of maturing. While mortality rates typically decline after that first winter at sea, mounting evidence shows that changing predator dynamics can significantly alter which fish survive to return as spawners. Recent research highlights the role of apex predators, particularly salmon sharks (*Lamna ditropis*) and killer whales (*Orcinus orca*) in salmon ocean survival.

Salmon sharks in the North Pacific have been identified as important consumers of salmon, including Chinook and chum. Nagasawa (1998)²⁹ estimated that salmon sharks could consume up to 12.6-25.2 million salmon annually in the North Pacific. Satellite-tagging studies by Carlisle et al. (2015)³⁰ reveal seasonal migrations of salmon sharks that closely track the distribution and timing of maturing salmon, indicating a strong top-down predator-prey coupling. Because sharks preferentially take larger individuals, increased shark predation can disproportionately remove the biggest, most fecund Chinook, shifting population size and age structure downward. Williams et al. (2018)³¹ conducted a comprehensive diet study of salmon sharks in the eastern North Pacific and found that Pacific salmon, including Chinook, made up a significant portion of their diet, particularly during summer months.

Killer whales are another top predator whose population and feeding patterns can shape Chinook demographics. Orcas particularly the fish-eating "resident" ecotype, are known to be significant predators of Chinook salmon. Ford et al. (2010)³² demonstrated that Chinook salmon are the preferred prey of resident killer whales in coastal waters of the northeastern Pacific, comprising over 70% of their diet in some areas.

Ohlberger et al. (2019)³³ published a groundbreaking study suggesting that increased predation by recovering populations of killer whales could be a major factor in the decline of Chinook salmon populations. Their research indicated that killer whale predation may be responsible for significant reductions in the abundance of large and older Chinook salmon across their range.

Manishin et al. (2021)³⁴ used Salcha River Chinook as an indicator for Yukon River populations and found striking shifts in age structure, especially in northern Alaska where ocean-age-5 and older fish have become rare or absent. Their modeling indicates substantially higher mortality after the first winter at sea than previously estimated—an

²⁶ Sturdevant, M. V., Orsi, J. A., & Fergusson, E. A. (2012). Diets and trophic linkages of epipelagic fish predators in coastal Southeast Alaska during a period of warm and cold climate years, 1997–2011

²⁷ Beamish, R. J., & Mahnken, C. (2001). A critical size and period hypothesis to explain natural regulation of salmon abundance and the linkage to climate and climate change

²⁸ Duffy, E. J., & Beauchamp, D. A. (2008). Seasonal patterns of predation on juvenile Pacific salmon by anadromous cutthroat trout in Puget Sound

²⁹ Nagasawa, K. (1998). Predation by salmon sharks (*Lamna ditropis*) on Pacific salmon (*Oncorhynchus* spp.) in the North Pacific Ocean

³⁰ Carlisle, A. B., Goldman, K. J., Litvin, S. Y., Madigan, D. J., Bigman, J. S., Swithenbank, A. M., ... & Block, B. A. (2015). Stable isotope analysis of vertebrae reveals ontogenetic changes in habitat in an endothermic pelagic shark

³¹ Williams, S. M., McHugh, M. J., Bester, M. N., Hofmeyr, G. J. G., & Pistorius, P. A. (2018). Salmon sharks: The apex predator you've probably never heard of

³² Ford, J. K., Ellis, G. M., Olesiuk, P. F., & Balcomb, K. C. (2010). Linking killer whale survival and prey abundance: food limitation in the oceans' apex predator?

³³ Ohlberger, J., Schindler, D. E., Ward, E. J., Walsworth, T. E., & Essington, T. E. (2019). Resurgence of an apex marine predator and the decline in prey body size

³⁴ Manishin, K. A., Cunningham, C. J., Westley, P. A., & Seitz, A. C. (2021). Can late stage marine mortality explain observed shifts in age structure of Chinook salmon?.

additional ~38% mortality among Chinook entering their third ocean year. The authors explicitly link their results to growing evidence of intense predation, noting consistency with studies implicating salmon sharks and marine mammals (including killer whales) as important sources of mortality.

Pinniped predation is also affecting salmon populations. Stellar’s sea lions, harbor seals, and grey seals have increased significantly over the past two decades while chinook populations are showing declines. Converging model results and field observations suggest that post-first-winter mortality—driven in part by apex predators (killer whales, salmon sharks, seals, & Stellar sea lions)—may be an underappreciated driver of Chinook productivity declines.

4. Ichthyophonus

Warming freshwaters facilitate and increase the virulence of pathogens and parasites. Marcogliese et al.³⁵ warned that higher temperatures could expand the range of certain fish diseases into previously cooler habitats, posing new threats to chum and Chinook salmon populations. This threat is especially evident on the Yukon River, where infections by *Ichthyophonus spp.* are widespread and a significant concern for health and survival.³⁶

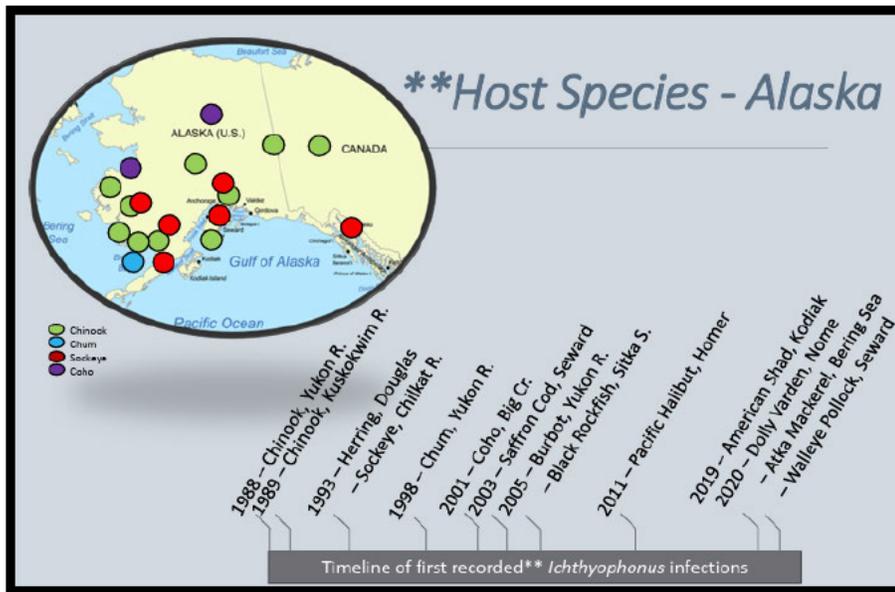


Figure 18. *Ichthyophonus* in Alaska by species and location which is primarily found in Chinook and chum on the Yukon. *Ichthyophonus* was first identified in the Yukon River in 1988 From ADF&G 2022

5. Ice sheet retreat

³⁵ Marcogliese, D. J. (2008). The impact of climate change on the parasites and infectious diseases of aquatic animals. *Revue scientifique et technique* (International Office of Epizootics)

³⁶ Investigating the impacts of *Ichthyophonus* on Yukon River Chinook Salmon chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/ayk/Investigating%20the%20impacts%20of%20Ichthyophonus%20BOF%20Final.pdf

Increased freshwater and sea temperatures have been widely researched. Yasumiishi et al. (2020)³⁷ investigated western Alaska Chinook production dynamics and found that summer growth decreased with increased sea temperatures in the north and southern Bering Sea, but growth increased with expanse of sea ice and a later ice retreat. Capelin (*Mallotus vilosus*) was identified as an important prey for juvenile Chinook especially during cold SST years. The long warming trend appears to create conditions for lower quality prey, which reduces fitness and increases mortality over winter.^{38,39} These sea ice conditions are more prevalent in the East Bering and in the past decade colder conditions have favored salmon in the West Bering Sea (Russian side).

6. Marine heat waves

Ocean warming compounds the freshwater issues outlined above and is also having profound effects on Chinook and chum salmon. Cunningham et al. (2018)⁴⁰ linked higher sea surface temperatures in the Bering Sea and Gulf of Alaska to reduced survival rates for Yukon River Chinook salmon. Changes in ocean conditions and food web dynamics can significantly impact salmon health and condition. Recent marine heat waves in the Bering Sea and North Pacific Ocean have had significant impacts on Chinook and chum salmon populations. These shifts are repeatedly linked to poorer fish condition, slower growth, and higher overwinter mortality for Chinook and chum cohorts.

Yasumiishi et al. (2020)⁴¹ reported significant declines in the body condition of juvenile Chinook and chum salmon in the eastern Bering Sea during the marine heat wave years. They found that salmon had lower lipid content and reduced energy density compared to previous years, indicating poorer feeding conditions and a higher risk of overwinter mortality. These declines in health condition likely translate into reduced early-marine survival and weaker cohort strength for affected years.

Building on this work, Murphy et al. (2021)⁴² examined the impacts of the marine heat wave on the distribution and abundance of forage fish species that are important prey for salmon. They discovered that warming waters led to northward shifts in the distribution of key prey species, potentially creating a mismatch between salmon migration patterns and food availability.

Farley et al. (2020)⁴³ conducted comprehensive surveys in the Gulf of Alaska during the International Year of the Salmon expeditions. Their findings revealed that Chinook and chum salmon caught during the marine heat wave years

³⁷ Yasumiishi, E. M., Farley, E. V. Jr, Maselko, J., Aydin, K. Y., Kearney, K. A., Hermann, A. J., Ruggerone, G. T., Howard, K. G., and Strasburger, W. W. 2020. Differential north–south response of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) marine growth to ecosystem change in the eastern Bering Sea, 1974–2010

³⁸ Farley, E. V., Starovoytov, A., Naydenko, S., Heintz, R., Trudel, M., Guthrie, C., Eisner, L. R. et al. (2011). Implications of a warming eastern Bering Sea for Bristol Bay sockeye salmon

³⁹ Hunt, Jr, G. L., Coyle, K. O., Eisner, L. B., Farley, E. V., Heintz, R. A., Mueter, F., Napp, J. M et al. 2011. Climate impacts on eastern Bering Sea foodwebs: a synthesis of new data and an assessment of the Oscillating Control Hypothesis

⁴⁰ Cunningham, C. J., Westley, P. A. H., & Adkison, M. D. (2018). Signals of large scale climate drivers, hatchery enhancement, and marine factors in Yukon River Chinook salmon survival revealed with a Bayesian life history model.

⁴¹ Yasumiishi, E. M., Farley, E. V. Jr, Maselko, J., Aydin, K. Y., Kearney, K. A., Hermann, A. J., Ruggerone, G. T., Howard, K. G., and Strasburger, W. W. 2020. Differential north–south response of juvenile Chinook salmon (*Oncorhynchus tshawytscha*) marine growth to ecosystem change in the eastern Bering Sea, 1974–2010

⁴² Murphy, James & Howard, Kathrine & Garcia, Sabrina & Moss, Jamal & Strasburger, Wesley & Sewall, Fletcher & Lee, Elizabeth. (2021). Juvenile Yukon River Chinook Salmon in a Warming Arctic..

⁴³ Farley, E.V., Jr., J.M. Murphy, K. Ciecziel, E.M. Yasumiishi, K. Dunmall, T. Sformo, and P. Rand. 2020. Response of Pink salmon to climate warming in the northern Bering Sea.

had significantly lower energy reserves compared to historical averages. This reduction in lipid stores likely drives salmon survival, maturation timing, and reproductive success, reinforcing the work of Yasumiishi and Murphy et al. These studies collectively demonstrate how extreme ocean conditions can exacerbate food limitations for salmon species, highlighting the vulnerability of these populations to climate-driven changes in marine ecosystems.

7. Pink salmon abundance and favorability of warmer oceans

In contrast to Chinook and chum salmon, a recent dissertation (*Juvenile Salmon Spatial Ecology in the Eastern Bering Sea* (2023))⁴⁴ found that juvenile pink salmon may have higher survival associated with increased sea surface temperatures (SST). Conjectures that abundant pink salmon (*Oncorhynchus gorbuscha*) are driving Chinook declines has received substantial attention, but the evidence is speculative and context-dependent. Conner et al. (2024),⁴⁵ argue that warming oceans disproportionately favor pink salmon: they have the broadest environmental tolerances, the least specific spawning requirements, and consequently the greatest capacity for rapid numerical expansion among Pacific salmon. At present, Asian and Russian pink salmon survivals in the Western Bering Sea are at all-time highs, whereas pink salmon on the Eastern Bering Sea (Alaska) survivals over the past decade are below average.

Ecologically, large pink cohorts may, in theory, reduce food availability for other salmon, although work by Orsi et al. (2005)⁴⁶ demonstrate little reduction in zooplankton standing biomass. Many empirical and modeling studies point to bottom-up ocean conditions and predator dynamics as the dominant drivers of Chinook performance. Several regional analyses (e.g., Morita et al., Yasumiishi, Murdoch et al., NOAA/ADF&G task-force findings) show either weak or inconsistent relationships between pink abundance and Chinook productivity; in most regions pink salmon appear to have little measurable impact, while in others they may exacerbate food-limitation during years of poor ocean productivity.

Proposal 140 OPPOSE – 5 AAC 09.200. Description of districts and sections. 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to reduce commercial salmon fishing area and modify existing Districts and Sections in the South Alaska Peninsula

The proposal seems to be in the category of a nuisance proposal that has little or no basis for consideration. This proposal re-defines severely reduced historical fishing areas within current management areas of the Belkofski Bay and Volcano Bay Sections in 5 AAC 09.200 and proposes using the new reduced areas in Post-June Salmon Management Plan for South Peninsula in 5 AAC 09.366. These “terminal” areas would fundamentally change the nature of the post-June fisheries, eliminating cape hook-offs and traditional fishing areas. The only reason suggested by the proposer for this change is that the current sub-districts as defined consist of a “tremendous amount of area.” However, no thought is provided for a conservation concern or that local stocks or stocks in the Chignik area are not meeting escapement.

Proposal 141 OPPOSE – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to enforce king salmon caps with

⁴⁴ Hart, L., (2023). Model based estimation of juvenile salmon spatial ecology in the Eastern Bering Sea

⁴⁵ Conners, B.M., Ruggerone, G.T., & Irvine, J.R. 2024. Adapting management of Pacific salmon to a warming and more crowded ocean

⁴⁶ Orsi J., Wertheimer A., Sturdevant M., Fergusson E., Mortensen D., & Wing B. 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions.

reductions in commercial salmon fishing time in the South Alaska Peninsula

This proposal would set thresholds of 1,000 Chinook harvest that would trigger a local area closure, while a 5,000 Chinook harvest would trigger a closure of the statistical area until August 10. We agree fewer Chinook salmon should be harvested in Area M and Area L. Area M Seiners' Proposal 135 calls for non-retention of Chinook in Area M, which will conserve more Chinook salmon than Proposal 141. This proposal sets limits of 1,000 and 5,000 harvestable Chinook. We suggest instead that the Board adopt a regulation requiring non-retention of Chinook in the Area L fisheries. Alternate language to the Chignik AC's Proposal 141 is proposed in **5 AAC 09.366**:

5 AAC 09.xxx. Retention of king salmon taken in a commercial fishery. This regulation is in place to provide guidance to the department when it is determined that conservation is required for king salmon. Notwithstanding 5 AAC 09.365 (e), from June 1 through October 31, if the department determines a need to conserve king salmon, the commissioner may, by emergency order, close the commercial salmon fishery and immediately reopen the commercial salmon fishery, during which king salmon 28 inches or greater in length may not be retained, and king salmon 28 inches or greater in length taken incidentally in the commercial salmon fishery must be returned to the water unharmed.

Non-retention of Chinook would be more effective than setting Chinook harvest thresholds that they propose to codify.

Proposal 143 OPPOSE – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. Modify the department's test fishery protocol found in the Post-June Salmon Management Plan for the South Alaska Peninsula.

This proposal seeks to change the protocols and definition of "immature salmon" for the post-June immature salmon test fishery. It also proposes to close the set gillnet fishery concurrently with the purse seine fishery if the immature salmon threshold is surpassed. The current regulatory protocol conducts six sets: two sets at each of three locations off Popof Head. All salmon gilled in the purse seine web are considered immature for the purposes of the current regulation. ADFG observers are on board for the entire process to conduct the counts and determine the average of the six sets. The salmon not gilled in the purse seine are placed in the hold, delivered to a processor and sold, which is considered "cost recovery" for the purposes of this regulation. A fish ticket is generated delineating species, weight, and number of salmon not gilled in the purse seine. The immature test fishery results frequently surpass the threshold, resulting in a decision not to open the fishery. Proposal 143 proposes including larger fish not gilled to be included as immature fish. However, these are commercially saleable salmon used to offset ADFG costs for the test fishery and to pay commercial fisherman's expenses and time. Non-gilled salmon are of legal size whether in this test fishery or in common-property fisheries.

The immature test fishery has stood the test of time and provides the Department with the information necessary to protect immature stocks in the area. The July fishery does not open until the immature requirement is met. On occasion, this has taken weeks and at other times, only days. Changing the protocol would not serve a useful purpose and would make the historical data set less useful for comparison purposes. Local stocks are meeting escapement goals and have been sustainably managed for over six decades.

Proposal 147 OPPOSE – 5 AAC 09.331. Gillnet specifications and operations. Reduce maximum gillnet depth to 70 meshes

This proposal seeks to reduce drift gillnet depth from 90 to 70 meshes, while erroneously citing the seine fishery as the rationale. Additionally, the proposal states that chum and Chinook travel at greater depths in the water column than sockeye. This reasoning is far too simplistic. Based on work by DeFilippo, maturing chum salmon commonly demonstrate a diel vertical migration from 200 meters and 350 meters (~1,000 feet)⁴⁷, far below either 90 or 70 mesh drift gillnet. A 90-mesh net with 4 ¾” mesh is approximately 35 feet in depth. Obviously chum salmon are encountered on the surface but not in abundance like sockeye salmon, the target species. Chinook encounters in the drift gillnet fishery are quite low. Finally, making this regulatory change would be financially burdensome with little payoff for chum salmon.

Proposal 148 OPPOSE – 5 AAC 09.332. Seine specifications and operations. Amend the seine specification to reduce the allowable size gear

This proposal reduces Area M purse seine depth from 375 meshes to a maximum of 325 meshes and reduces a lead from 150 fathoms in length to a maximum 100 fathom length. Additionally, the maximum aggregate length of a lead and seine would be 250 fathoms. Under the proposed regulation, using a 100-fathom lead would effectively reduce the current 400-fathom length (150-fathom lead plus 250-fathom seine) to 250 fathoms (100-fathom lead plus 150-fathom seine). Under this change, a fisherman would need a 250-fathom length net when fishing without a lead and a 150-fathom net when fishing with a lead. The cost of this proposal is high, requiring modification of nets or purchase of new nets. This proposal is based on conjecture, is anecdotal and without merit. Proposal 148 cites no data or evidence as to what shortening or reducing net depth will accomplish. But it appears the reasoning behind this proposal—that chum and chinook “travel at greater depths [than] sockeye, pinks, and coho”—is seriously flawed. Freshwater C., et al⁴⁸ in research conducted off the Washington and Vancouver Island coastlines, note that vertical habitat selection by Chinook was determined by a suite of factors including bathymetry, seasonality, location, and life history. There is no one size, or depth, that fits all. Chinook traverse within a wide spectrum of the water column from surface to near bottom. Therefore, this is an untenable proposal that will not accomplish the stated goal.

The stated concern is reducing June harvest of CWAK chum and, to a lesser extent, chinook. Reduction of chum harvest in June is being addressed by Area M fishermen. Since 2023 when the Board endorsed the fishermen’s adaptive management plan and implemented time and area restrictions June chum harvest has declined. The adaptive management plan has proven to be effective in reducing the June chum harvest significantly. A better and more effective alternative for chinook concerns is non-retention of Chinook for the entire season; this addresses the Chinook harvest head on and saves more Chinook.

Adaptive management entails fleetwide communication and directives to cease fishing when high concentrations of chum salmon are encountered. In 2025, 156,136 chum were harvested in June while in 2023 harvest was 208,984. The current regulation adopted in 2023 reduced fishing time from 352 hours to 310 hours, effectively lengthening the non-

⁴⁷ DeFilippo, L., et al. (2025). Drivers and Dynamics of Salmon Bycatch in the Eastern Bering Sea Pollock Fishery

⁴⁸ Freshwater C., 2024. Chinook salmon depth distributions on the continental shelf are shaped by interactions between location, season, and individual condition

fishing period in mid-June. Chum salmon harvest in June has been reduced in the past three years by 50% when compared to the past two decades. According to ADFG harvest data, the 2014-2023 June average was 497,525 while the 2004-2023 average was 432,362. More importantly, based on genetic stock identification, most of these chum are not CWAK-origin but Asian and East of Kodiak origin (59.4%, see table below, the 2023 data).

Table 1. — Preliminary reporting-group specific stock composition and harvest estimates for South Peninsula area, June 2023, all strata. Median, 90% credibility intervals, means, and SDs are reported.

Reporting Group	Proportions (%)					Harvest = 206,037; 13 Strata				
	Median	90% CI		Mean	SD	Median	90% CI		Mean	SD
Asia	39.5	37.9	41.0	39.5	0.9	81,362	77,202	85,694	81,411	2,516
Kotzebue Sound	1.7	1.0	2.4	1.7	0.4	3,412	2,093	4,978	3,456	888
CWAK	28.4	26.8	29.9	28.4	0.9	58,437	54,915	62,164	58,497	2,190
Upper Yukon	0.6	0.3	1.1	0.6	0.2	1,277	586	2,153	1,314	475
Northern Dist.	1.0	0.5	1.6	1.0	0.3	2,006	1,063	3,289	2,084	687
Northwestern Dist.	1.4	0.9	1.9	1.4	0.3	2,782	1,943	3,858	2,838	584
South Peninsula	2.2	1.2	3.8	2.3	0.8	4,585	2,454	7,891	4,830	1,729
Chignik/Kodiak	5.2	3.4	6.7	5.1	1.0	10,643	6,898	13,750	10,489	2,123
East of Kodiak	19.9	18.7	21.3	20.0	0.8	41,051	38,495	43,991	41,118	1,682
Total									206,037	

Nor is it correct that, as stated in Proposal 148, a “huge increase in chum interception” and “rapid growth of the purse seine fleet” has occurred. The number of Area M purse seine permits is fixed at 118, but active annual fishing boats are far less in number. The number of available permits has remained relatively stable in recent years, with an average of 118 available between 2014-2023 and an average of 61 permits *fished* during that same period. Permits fished in 2025 were about 46. Finally, the regulation adopted by the Board in 2023 set maximum June chum harvest thresholds by opening, which if reached, would close the current opening or even close the remainder of the June fishery.

The CWAK chum stocks on the Yukon River recovered from the low of 2021 and met escapement goals in 2023 and 2024. In 2025, 347,529 chum were counted, which did not meet the lower bound. However, the parent year for this cohort was the lowest escapement on record (153,718 in 2021) and predictably, a low 2025 return was expected.

Area M catch of CWAK chum is not a huge factor driving CWAK productivity. There are several climate-driven factors and apex predators that figure prominently in CWAK productivity – permafrost melt releasing sequestered heavy metals in over 75 streams, spawning temperatures reaching lethal levels, sea ice retreat affecting productivity in the Eastern Bering Sea, and apex predator complex of killer whales, Stellar sea lion, pinnipeds, and salmon sharks. A scientific review of these topics has been laid out in opposition to Proposals 127, 128, 129, 130, 131, 132, 133, and 136.

Area M fishermen are doing their part to reduce Chinook and June CWAK chum harvest; changing purse seine length and depth is not appropriate and will do nothing to address the considerable issues in the Yukon and Kuskokwim riverine ecosystems.

Proposal 149 OPPOSE – 5 AAC 09.331. Increase the allowable commercial set gillnet length from 100 to 200 fathoms.

We agree with ADF&G comments that increasing the set gillnet length from 100 to 200 fathoms would result in gear conflicts.

Proposal 151 OPPOSE – 5 AAC 09.331. Amend gillnet specification to reduce the allowable gear

Proposal 151 seeks to remove regulation (5) 25 fathoms of seine webbing may be used on the shoreward end of a set gillnet. This provision in regulation provides a measure of safety for set netters during frequently occurring inclement weather conditions and complex wave action. Safety is no small matter in a fishery using small watercraft in a notoriously windy, whitecapped environment. It is true the addition of seine web makes the setnet operation more effective, but the set gillnet harvest is quite small, representing 2.2% of all gear harvest in 2025. A proposal of this nature appears punitive in nature and disregards the safety of set netters and their fragile economic reality. This provision in regulation has worked for decades, does not create a conservation concern, and therefore should be rejected.

Proposal 152 OPPOSE – 5 AAC 09.332. Seine specifications and operations. Amend the seine specification to reduce the allowable size gear

Proposal 152 is identical in regulatory language to Proposal 148, although Chignik sockeye has been added to the affected species. Chignik sockeye experienced an over-escapement in 2025 and a harvest of over 800,000 fish. This is more of a red herring than a Chignik sockeye issue. We repeat our comments for Proposal 148 regarding Chinook and CWAK chum and net depth.

* * *

In conclusion, we sympathize with the extremely difficult situation the people of the AYK area confront, particularly along the Yukon River, but as the late Senator Stevens said, “trading one of Alaska’s resources for another is not a solution”. This is especially true when science points to the true causes, and it is not the Area M fishery. Thank you for this opportunity to comment. We look forward to working with the Board in February.

Sincerely,

Kiley Thompson, President Area M Seiners Association

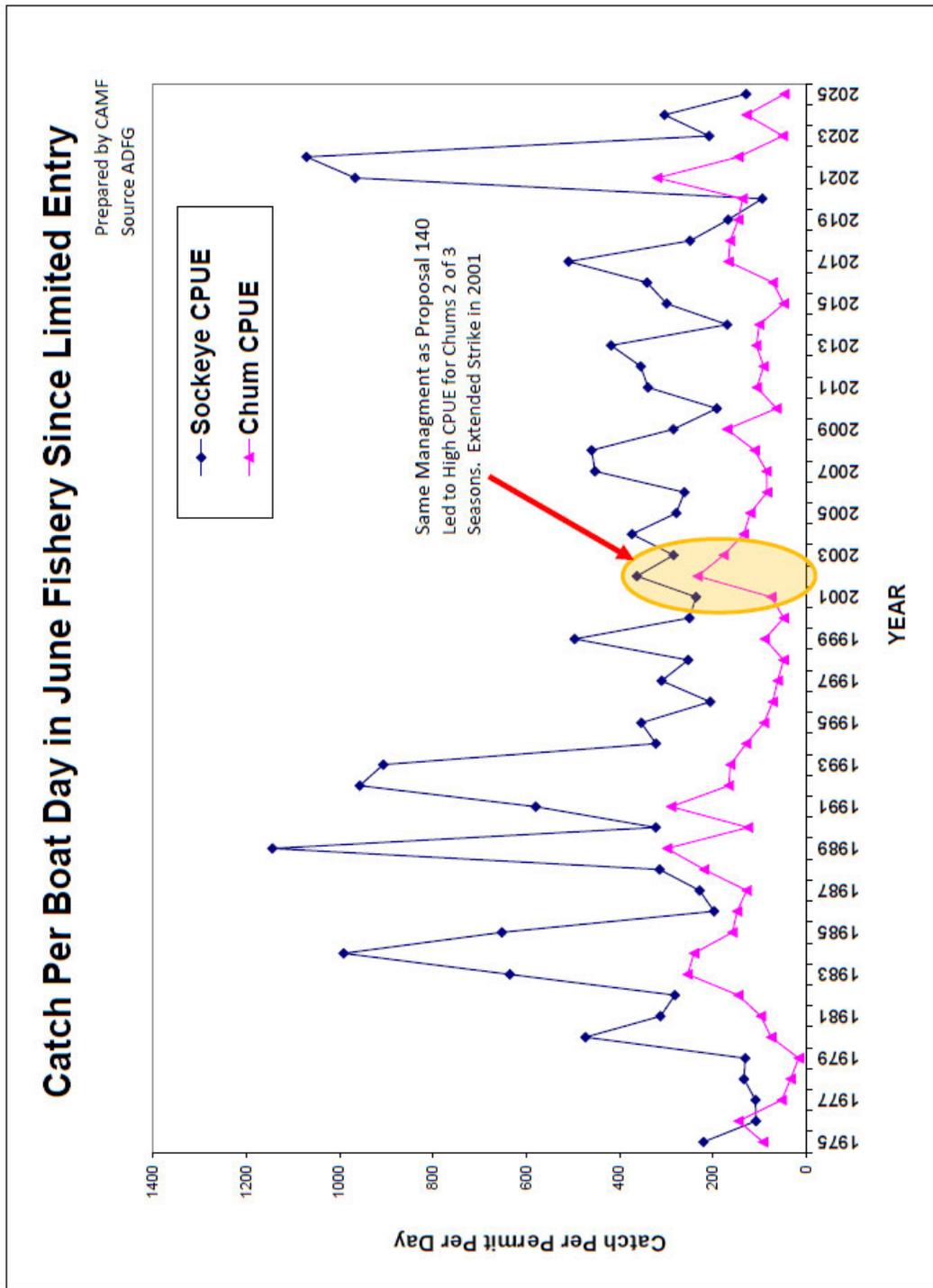


Figure 19. Catch per boat day, all permits fished by year. Sockeye catch per boat varies widely, whereas chum catch per boat has far less variation. 2021 was a recent anomaly, although similar to 1989 and 1991.

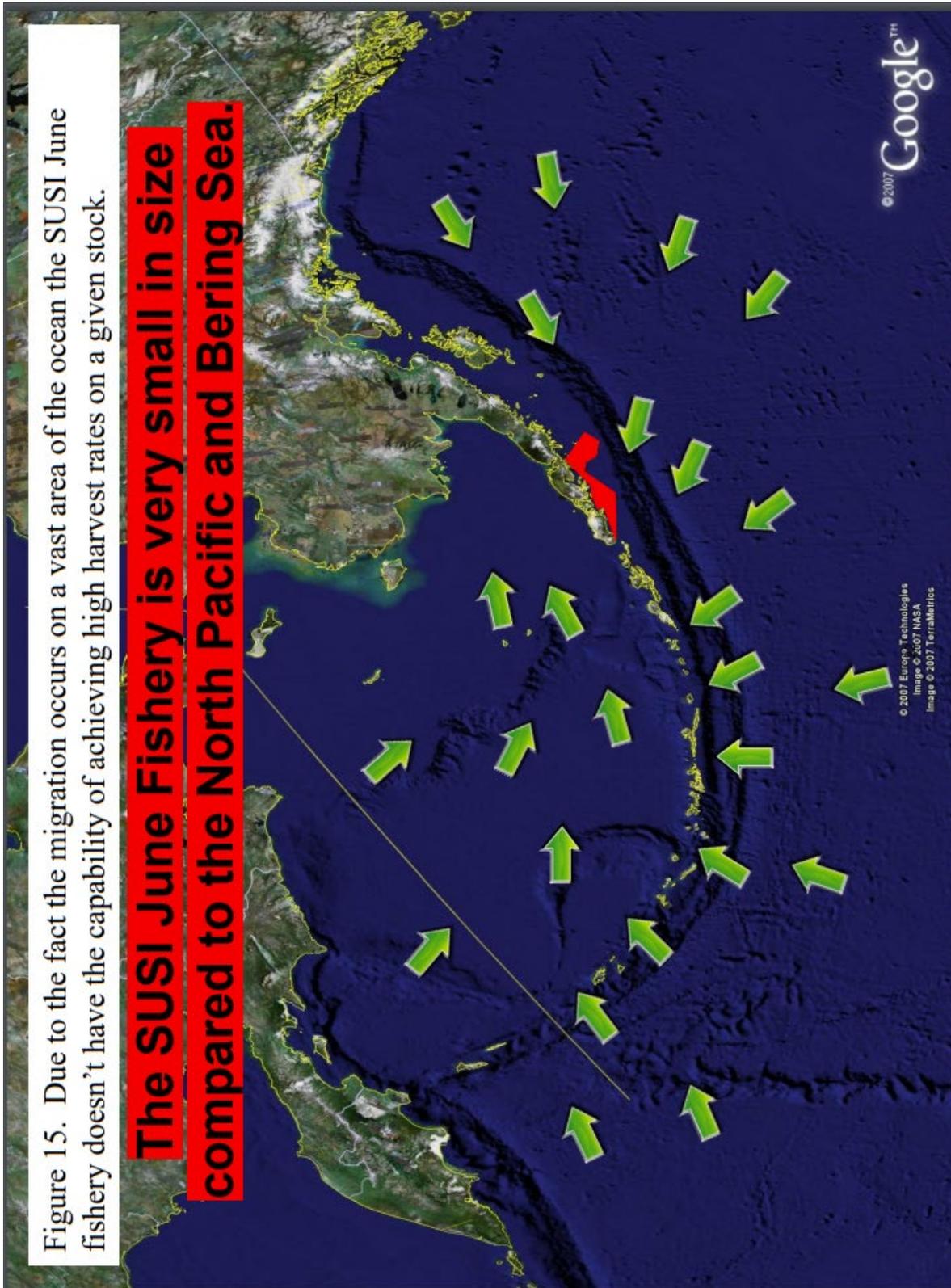


Figure 20. Area M is a small area compared to the broad area where chum and sockeye migrate back to their natal streams. This helps explain why the harvest rate on CWAK stocks consistently remains in the low single digits.

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Scientific Literature, Presentations, and Information Regarding AYK Chum Stock Status

Ens, N. 2022, Distribution and Abundance of Salmon Prey Species in the Eastern Gulf of Alaska as Observed by the Winter 2022 IYS Pan-Pacific Expedition

Synopsis: Low prey availability during winter months has been posited as a limiting factor of salmon biomass in

the Pacific Ocean. As such, appreciable efforts have been made to quantify patterns of spatiotemporal distribution and abundance of prey species consumed by salmon during their oceanic phase.

Gilk-Baumer, S., Genetic stock identification of sockeye, chum, and pink salmon from the 2022 Pan-Pacific winter expedition

Synopsis: Chum salmon samples from the Central region (N = 479) were composed 83% Asian stocks, while chum from the Eastern region (N = 127) were 25% Asian stocks

Howard, K., 2022. Western Alaska Chinook and Chum Salmon Marine Research

Synopsis: Future run size of Yukon Chinook is determined very early in their life – before their first winter at sea. Relationship of fry abundance in Yukon and adult return, the R^2 is 0.82, highly correlative. Juvenile chum had similar correlation as Chinook until 2016 when the marine environment got very warm and Yukon chum survival crashed.

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International Year of the Salmon Research program website with dozens of most current ocean chum salmon symposia and papers. <https://yearofthesalmon.org/>

Larson, S. and Howard, K. 2019. Exploration of AYK Chinook Salmon Egg Thiamine Levels as a Potential Mechanism Contributing to Recent Low Productivity Patterns, 2014 and 2015

Synopsis: In 2015, 58% of the eggs had thiamine concentrations associated with secondary effects of thiamine deficiency that can lead to mortality

Miller, T. 2022, Nutritional Ecology of Juvenile North Pacific Salmon During Winter Existence: Results from the 2022 International Year of the Salmon Surveys

Synopsis: Using proximate composition (percent lipid and protein) and stable isotope analyses, we assessed the nutritional condition and isotopic (trophic) life histories of Pacific salmon from the 2022 International Year of the Salmon (IYS) winter month surveys across the North Pacific, a period of reduced prey availability and potentially higher resource competition

Murphy, J. 2022 Coastal Surveys in Alaska and Their Application to Salmon Run-Size and Harvest Forecasts

Synopsis: The first critical period occurs during the estuarine or initial marine period of salmon. Predation-based mortality can often be the key factor during this critical period of salmon. The second critical period is believed to be primarily dependent on the ability of salmon to reach a critical size or nutritional state required to survive marine winters (Beamish and Mahnken 2001)

Ruggerone, G. Bottom-up and Top-Down Processes Drive the survival and Abundance of Pacific Salmon.

Synopsis: exceptional pink salmon abundance in 2018 & 2019 contributed to sharp decline in other salmon species productivity and harvest in 2020 and beyond. https://npafc.org/wp-content/uploads/1-5_Ruggerone_trim-c8e65a4348451a3edd0b25c9822214e1.mp4

Urawa, S. & Sato, S. Stock Identification of Chum Salmon Overwintering in Gulf of Alaska by Using a New SNP Baseline.

Synopsis: Study year 2019 and observation of juvenile and sub-adult chum salmon in North Pacific, part

of the International Year of the Salmon research. Ocean age -1 chum had lower lipid content than older chum. Depletion of energy reserves observed. Frequent occurrence of skinny chum. CWAK stock poorly represented, especially ocean age-1 almost nonexistent.

<https://npafc.org/wp-content/uploads/Day-1-Keynote-Presentation-5-Shigehiko-Urawa-Shunpei-Sato-Terry-b7b0b5fed162183a8dd511b59cd452f2.mp>

Submitted by: Trina Aus

Community of Residence: Eagle River, AK

To Members of the Alaska Board of Fisheries,

My name is Trina Aus, and I am from King Cove, Alaska. I am submitting my comments today in strong opposition to any proposals that would sharply reduce fishing time and opportunity in Area M. Any additional closures would do irreparable harm to our families and communities.

Area M fisheries have been a part of my life for as long as I can remember. My grandpa owned and operated a fishing vessel his entire life, and some of my best memories are from tendering alongside him in the Area M fisheries. Fishing wasn't just his livelihood—it was part of who he was, and those experiences shaped me profoundly. My dad was also an Area M fisherman, and we lost him at sea while he was doing what he loved. These waters carry my family's history, our stories, and our deepest connections.

King Cove is home to me, and it holds a special place in my heart. Without the fishery, I fear that the village would cease to exist. Fishing is the anchor that keeps our community standing—supporting our families, our school, our services, and our culture.

We have strong cultural ties to these waters and lands. Fishing is more than an occupation here—it is a way of life and the root of our people. The traditions, subsistence practices, and cultural identity of our region are inseparable from the fishery. Any erosion of fishing opportunity directly threatens not just our economy, but our way of life.

Fishing is the primary economic driver in our region. Our families, small businesses, and communities rely on these fisheries not only for income, but for cultural continuity and long-term stability. Please support balanced management that sustains jobs, local economies, and the deep cultural traditions that define our region.

Thank you for your time and consideration.

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I have lived in King Cove for 10 years.

The community depends on fishing. The loss of a cannery has seriously impacted us. I fear our community will die if fishing is restricted.

Our cost of living is high in a rural community. If income is diminished from fishing, it will impact every aspect of our lives. Fishing is the bedrock of our economy, and without it, everything crumbles.

Climate and habitat stressors are major drivers of declines and can't be "regulated away." Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Susan Bailey

[REDACTED]

King Cove, AK

F/V Good Deal Summary of Support for Proposals 113, 114 and 115

I am writing to express my strong support for a suite of proposals—113, 114, and 115—that are critical for the efficient management and economic viability of our fisheries. These proposals address outdated regulations, provide necessary harvest opportunities when escapement goals are met, and correct management plans that currently restrict access to available resources.

Proposal 113: Reopening Caribou Flats to Harvest Surplus Sockeye

I support Proposal 113, which seeks to reopen the Caribou Flats Section to commercial set and drift gillnet gear when the Nelson River sockeye salmon biological escapement goal (BEG) is expected to be exceeded between June 20 and July 31. Currently, this section is closed by regulation, even in years when the upper end of the escapement goal (97,000–219,000 sockeye) is achieved early in the season. It is only logical that when the Nelson River BEG is exceeded, we should have the flexibility to access those surplus fish in the Caribou Flats Section, rather than foregoing harvest opportunities.

Proposal 114: Repealing Obsolete Regulatory Language

I support Proposal 114 to repeal language in the Northern District Salmon Fisheries Management Plan that sunsetted on December 31, 2018. This proposal is a necessary housekeeping measure to remove expired regulations regarding rolling closures that are no longer in effect, ensuring our regulatory book is current and clear.

Proposal 115: Updating Northern District Management Dates

I support Proposal 115 to amend the Northern District Salmon Fisheries Management Plan. Specifically, changing the date that management in the Ilnik Section transitions from Ilnik River sockeye to Bear River sockeye from July 20 to July 31 is a crucial adjustment. This change better aligns management with the actual run timing and abundance of stocks in the area. Furthermore, the proposal adds necessary language to conserve Bear River sockeye salmon in the Southwest Ilnik portion of the section when escapement goals are not being met, balancing harvest opportunity with conservation needs.

Respectfully,

Thomas Bell

PC19

Submitted by: Craig Bendixen

Community of Residence: King Cove, AK

I am a member of CAMF and have been a drift permit holder and fished Area M since 1986. I am also a father of two with one of my kids fishing with me. I am in support of proposals 113-115,119,121-124,134,135,137,139,142,144,145,150,153,154,156-160,188...I am in opposition to proposals 108-112,116-118,120,126-133,136,140,141,143,147,148,151,152.....I am also a lifelong resident of King Cove and having lost our only processor a few years ago it has been a serious setback for the community and any further loss of fishing opportunity would only exacerbate the problem

PC20

Submitted by: Clinton Boskofsky

Community of Residence: Chignik Lake

In support of proposals 120, 126, 131, 133, 140, 141, 143, Chignik fishermen Area L have been restricted in our local traditional fishing area last 2 fishing seasons to 2 days per week. In past fishing in chignik fishing used to support around 50 permi

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I have been an Area M drifter for 20 years as crew and for 7 years as an owner/operator. Further regulation and lost time could create a situation where this fishery is no longer feasible by any standard.

This could be the end for King Cove.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Climate and habitat stressors are major drivers of declines and can't be "regulated away."

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Blake Bradley

[REDACTED]

Port Moller, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

My name is Carisa Brandall and I am from King Cove. I am writing today not just as a community member, but as someone whose family, work, and future are deeply tied to our fishery.

My grandfather is 100 years old. He fished well into his 80s, and fishing was never just a job for him—it was a way of life. He taught our family respect for the ocean, for salmon, and for the responsibility that comes with harvesting from the land and sea. His generation understood balance long before it was written into regulation. That knowledge has been passed down, and it still lives in our fishermen today.

I believe children are the heartbeat of King Cove. I work with our kids at the teen center and occasionally at the City Gym, and every day I see their strength, curiosity, and deep connection to this place. I also see the impacts of instability. When fishing opportunities are reduced, it shows up in our programs, our resources, and our ability to support these kids. Budget cuts tied to fishery restrictions have had real consequences, including fewer activities, fewer supports, and fewer opportunities for our youth.

These impacts are not theoretical. They affect families, elders, and especially children. When the fishery struggles, the entire community feels it.

I have personally witnessed local fishermen make hard sacrifices to protect the resource. I have seen them give up openers to allow salmon to pass. These are not people who are reckless or unwilling to conserve. They care deeply about the future of the fishery because it is their children and grandchildren who will inherit it. That is why I support maintaining the status quo and continuing the adaptive management approach that allows flexibility while protecting salmon runs.

Further restrictions are not the answer for a community that has already given so much. King Cove fishermen have proven they are responsible stewards, willing to adjust, sacrifice, and work with managers to ensure sustainability. What we need now is stability so families can plan, programs can continue, and kids can grow up with the same connection to fishing and community that my grandfather passed down to us.

Please consider the real people behind these decisions. Consider the elders who built this community, the fishermen who continue to protect the resource, and the children who represent King Cove's future.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Respectfully,
Carisa Brandall
King Cove, AK



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I would not have the money to support myself or pay for college if additional fishing time is taken away. It would ruin many people's daily lives because we cannot just sit around for a month while other communities are fishing.

Area M fishermen have already given up significant time, and further restrictions would only push more people out of our communities and away from the livelihoods they depend on.

Respectfully,

Jager-Sean Brandell
King Cove, Alaska



Bristol Bay Fishermen's Association

P.O. Box 60131

Seattle, WA 98160

Phone (206) 542-3930

bbfa@seanet.com

www.bristolbayfishermen.org



February 3, 2026

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 Alaska Peninsula / Aleutian Island / Chignik 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".

Luke Peterson
President

BBFA's Positions/Comments for the Alaska Peninsula / Aleutian Island / Chignik Finfish Board of Fisheries

Proposal 133: Support

If passed, the window closures for fishing time in the South Unimak and Shumagin Islands sockeye fishery would be of longer duration and allow for more passage of migrating Chinook and Chum salmon returning to the Nushagak River in Bristol Bay. Nushagak river Chinook salmon has been designated a stock of concern by ADF&G. Restrictive measures have been put in place by the Board of Fisheries for the Nushagak sockeye commercial fishery. Maintaining optimal escapement numbers for the Nushagak Chinook salmon has become a priority, passage of proposal 133 will contribute to that escapement goal.

Proposal 134: Oppose

Proposal 134 would increase fishing time in the South Unimak and Shumagin Islands June fishery for sockeye. If passed, it would increase bycatch of Chinook and Chum salmon bound for the Nushagak River. Every fish bound for this river counts.

Proposal 135: Oppose

Proposal 135 would establish a requirement to release King salmon that are 28" in length, or greater, for the June, South Unimak and Shumagin Islands purse seine sockeye fishery. This idea is impractical in a high-volume sockeye directed fishery and simply will not save Chinook salmon.

To: Cody Larson, Bristol Bay Native Association

From: Sam Friedman, McKinley Research Group

Date: February 15, 2023

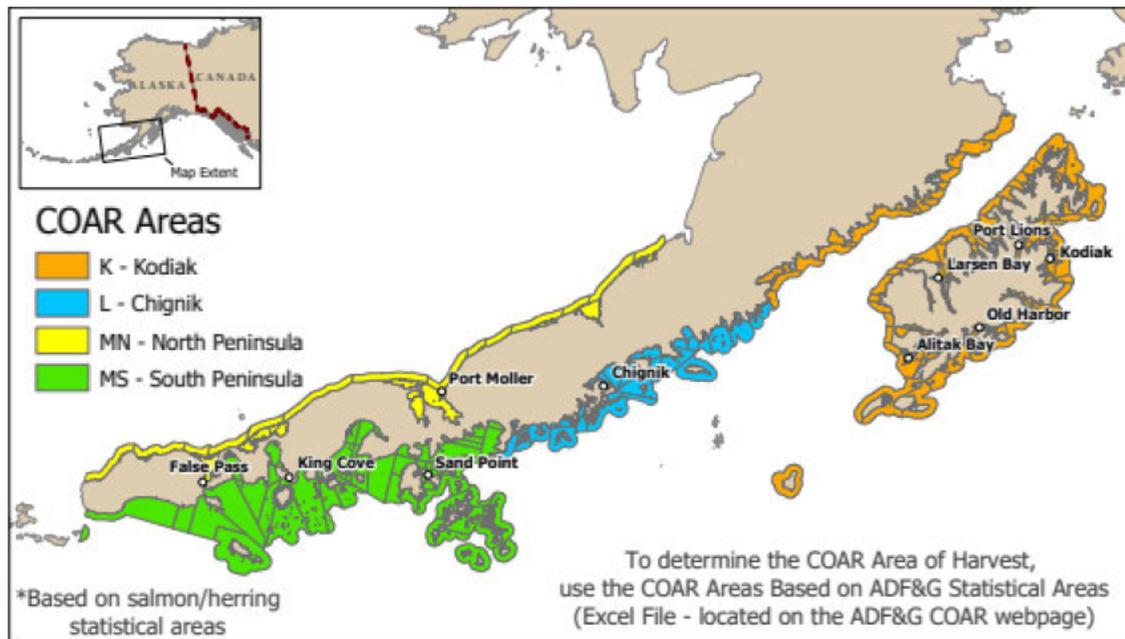
Re: Chignik Fishery Data

Below is a summary of our findings regarding Chignik and Alaska Peninsula commercial fishing and community population data. We look forward to your review.

Geographic Terms

Throughout this summary, comparisons are made between the Chignik and Alaska Peninsula areas. Unless otherwise noted, Alaska Peninsula refers to Area M and Chignik refers to Area L, as defined by the Alaska Department of Fish and Game in the figure below. These regional harvest areas differ significantly from Census and borough boundaries, which are often used for tabulating statistics.

Figure 1. ADF&G COAR Areas K, L, and M



Source: Alaska Department of Fish & Game

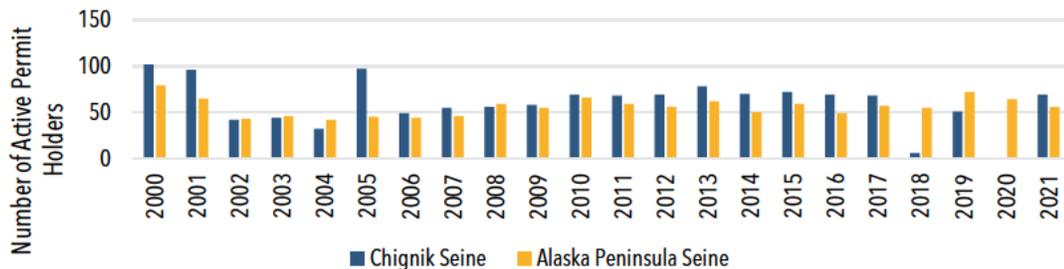
Participation and Residency of Area L and M Purse Seine Permit Owners

The average number of salmon purse seine fishery participants (active permit holders) was similar for both Chignik and the Alaska Peninsula in the 2000-2021 period (60 average annual participants for Chignik and 56 for the Alaska Peninsula). However there has been much greater variability in the Chignik seine fishery, with participation ranging from 102 active permit holders in 2000 to zero in 2020, the year that no commercial harvest was allowed because of low salmon returns. In contrast, the participation in the Alaska Peninsula fishery ranged from a high of 79 to a low of 42 active permit holders.

For most of the last 20 years, a greater number of permit holders participated in the Chignik fishery than the Alaska Peninsula fishery. However, in three of the last four years, Alaska Peninsula participation was higher.

The figure below includes only purse seine permits in the Alaska Peninsula, not the two other commercial salmon fishing gear types used in that region: drift gillnet and set net. Purse seining is the only commercial fishing gear type for salmon in Chignik.

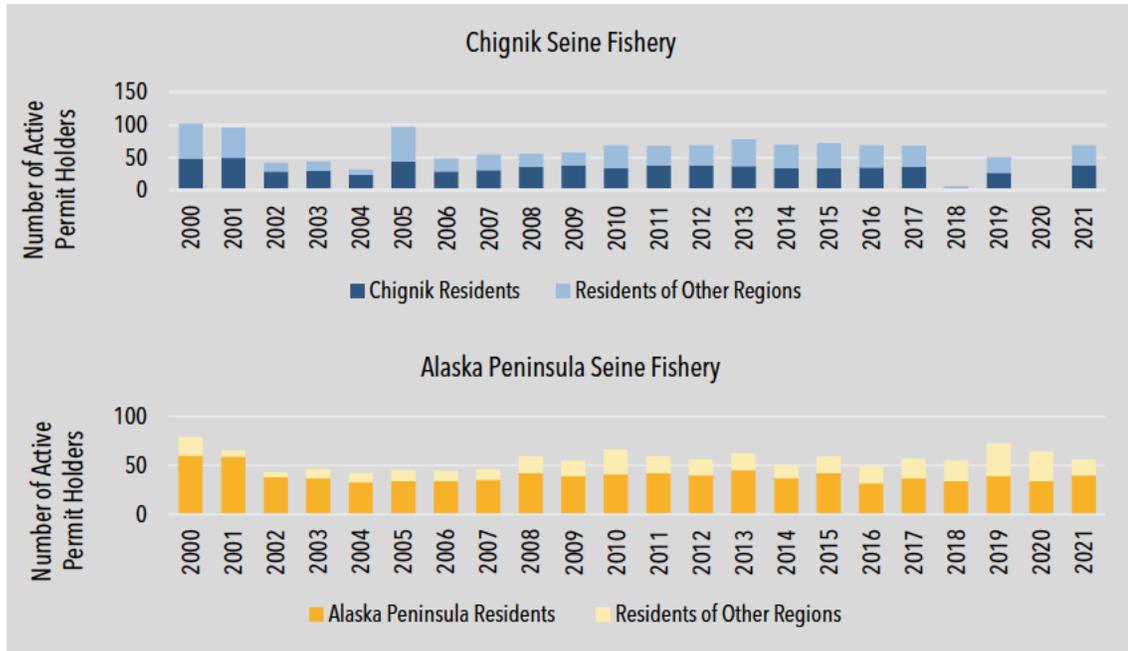
Figure 2. Number of Active Chignik and Alaska Peninsula Salmon Purse Seine Permits, 2000-2021



Source: Alaska Commercial Fisheries Entry Commission

While the majority of active permits holders in both fisheries live regionally where the fisheries take place, a smaller percentage of active Chignik permit owners lived in proximity to the fishery than Alaska Peninsula permit holders in the 2000-2021 period. On average, 56% of Chignik permit holders were residents of Chignik communities. In contrast, 72% of Alaska Peninsula permit holders were Alaska Peninsula residents. The percentage of local participants in the Alaska Peninsula fishery has decreased over time but has remained fairly stable for the Chignik fishery. In both fisheries, most non-local participants in recent years have been residents of either Anchorage or Washington state.

Figure 3. Number of Number of Active Chignik and Alaska Peninsula Salmon Seine Permits by Residency of Permit Holder, 2000-2021



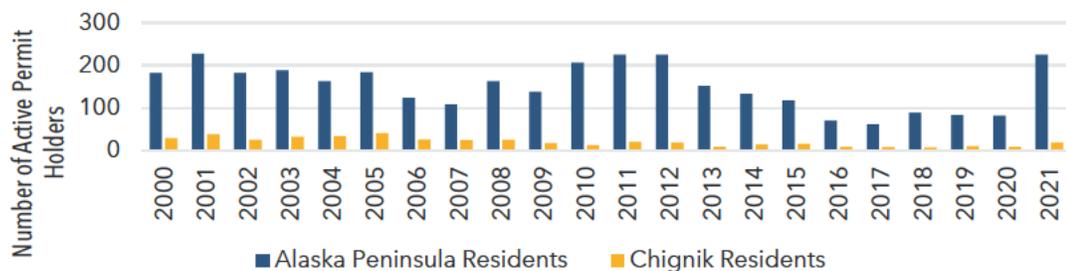
Source: Alaska Commercial Fisheries Entry Commission

Income from Non-Salmon Fisheries

Residents of both Chignik and the Alaska Peninsula participate in several other non-salmon commercial fisheries, including longline halibut, pot Dungeness and tanner crab, and finfish caught with trawl or pot gear.

A greater number of Alaska Peninsula residents own and use permits for these non-salmon fisheries compared to Chignik residents. In 2021, 225 Alaska Peninsula residents fished permits for non-salmon species. Only 19 Chignik residents used non-salmon permits that year.

Figure 4. Number of Active Chignik and Alaska Peninsula Permits for Non-salmon Fisheries, 2000-2021



Source: Alaska Commercial Fisheries Entry Commission

Because of the limited participation, gross earnings data of Chignik residents are not available for the last decade except for one fishery, the Chignik salmon purse seine fishery. Gross earnings for this fishery totaled more than \$3.9 million in 2019, then dropped to no earnings in 2020 and grew to more than \$6.3 million in 2021. These gross earnings are described as minimums because while some communities (such as Chignik and Chignik Lake in 2021) had active resident fishermen, earnings data are not disclosable because of CFEC data confidentiality policies.

Gross earnings for salmon purse seine and additional fisheries are available for Alaska Peninsula residents. As with the Chignik data, these gross earnings estimates are minimums because they do not include data from communities where data are not available to protect confidentiality.

Table 1. Estimated Minimum Gross Earnings of Alaska Peninsula Resident Permit Holders (\$millions), 2019-2021

	2019	2020	2021
Total Alaska Peninsula salmon	\$7.5	\$2.6	\$16.2
Salmon, purse seine	\$4.9	\$1.6	\$6.9
Salmon, set gillnet	-	-	\$6.6
Salmon, drift gillnet	\$2.6	\$1.0	\$2.7
Misc. finfish, otter trawl	-	-	\$6.6
Halibut, longline	\$2.6	\$1.0	\$2.7
Dungeness crab, pots	\$0.7	\$0.4	\$2.2
Misc. finfish, pots	\$1.4	\$0.9	\$0.8
Tanner crab, pots	\$1.0	\$1.8	-
Other species and gear types	-	\$0.5	\$0.8

Source: Alaska Commercial Fisheries Entry Commission

Note: Gross earnings are likely unrepresented because of redacted data due to confidentiality.

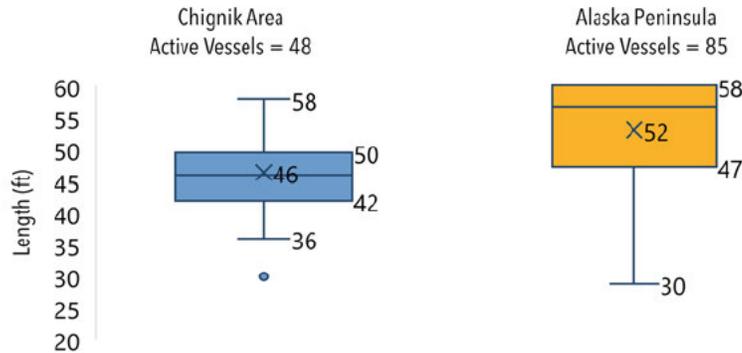
Vessel Characteristics of Area L and M Active Seiners

The following charts show the composition of purse seine vessels used in 2021. Of the three vessel characteristics reviewed (length, age, and horsepower), length varied the most between Chignik and Alaska Peninsula vessels.

The mean length of a Chignik seine vessel in 2021 was 46 feet. The size of the fleet was clustered evenly around this size. Four vessels (8% of total) measured 58 feet, the maximum length of a seiner in Alaska.

In contrast, the average vessel length in the Alaska Peninsula was 52 feet. Nearly half the seiners active in the Alaska Peninsula were the maximum size of 58 feet.

Figure 5. Distribution of Vessel Length (feet) for Active Seiners Operating in the Chignik and Alaska Peninsula Harvest Areas, 2021



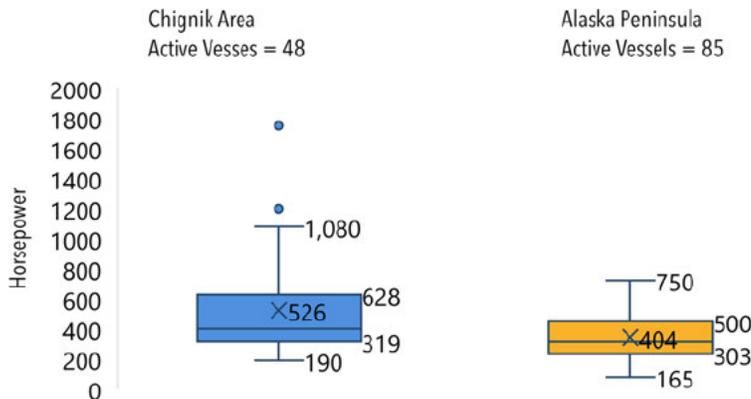
Source: Alaska Commercial Fisheries Entry Commission

Note: Charts depict the distribution of each data set. The “x” is the mean, the top of the box is the first quartile, the horizontal line is the second quartile (median), and the bottom of the box is the third quartile. The “whiskers” represent the minimum and maximum values of the data, excluding outliers (depicted as dots).

The distribution of vessel horsepower was similar between the two regions, especially for the bulk of both fleets which ranged between 300 and 600 horsepower.

The mean horsepower in the Chignik area was more than 100 horsepower higher than the mean in the Alaska Peninsula because of a relatively small number of especially high horsepower Chignik boats, including seven vessels with 1,000 horsepower or more.

Figure 6. Distribution of Horsepower for Active Seiners Operating in the Chignik and Alaska Peninsula Harvest Areas, 2021



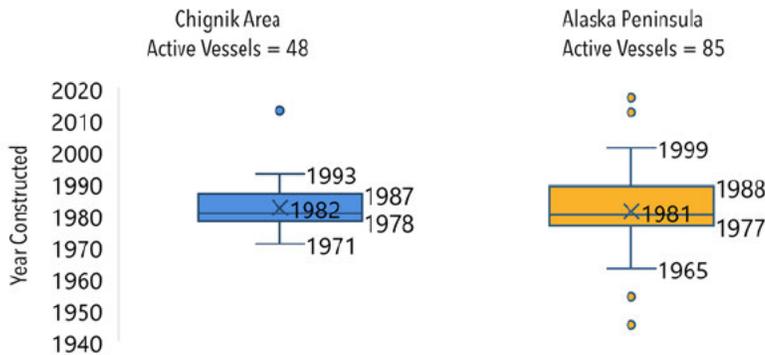
Source: Alaska Commercial Fisheries Entry Commission

Note: Charts depict the distribution of each data set. The “x” is the mean, the top of the box is the first quartile, the horizontal line is the second quartile (median), and the bottom of the box is the third quartile. The “whiskers” represent the minimum and maximum values of the data, excluding outliers (depicted as dots).

The ages of the Chignik and Alaska Peninsula seine fleets were similar in 2021. Half of the boats in both fleets were built between 1977 and 1988, with an average age in 2021 of 39 years (Chignik) and 40 years (Alaska Peninsula).

There were a greater number of especially new and especially old boats in the Alaska Peninsula, including one boat built in 1949.

Figure 7. Distribution of Vessel Age (Year Constructed) for Active Seiners Operating in the Chignik and Alaska Peninsula Harvest Areas, 2021



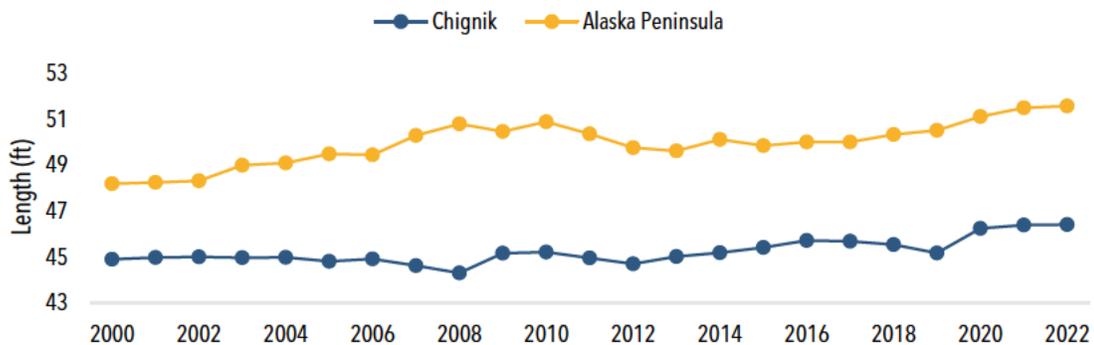
Source: Alaska Commercial Fisheries Entry Commission

Note: Charts depict the distribution of each data set. The “x” is the mean, the top of the box is the first quartile, the horizontal line is the second quartile (median), and the bottom of the box is the third quartile. The “whiskers” represent the minimum and maximum values of the data, excluding outliers (depicted as dots).

Change in Vessel Length Over Time

The average length of an active purse seine vessel increased in both Chignik and the Alaska Peninsula between 2000 and 2022. The average length increased by 3.3% for Chignik seiners and 6.8% for Alaska Peninsula seiners.

Figure 8. Change in Mean Vessel Length Over Time for Seiners Operating in the Chignik and Alaska Peninsula Harvest Areas, 2000-2022



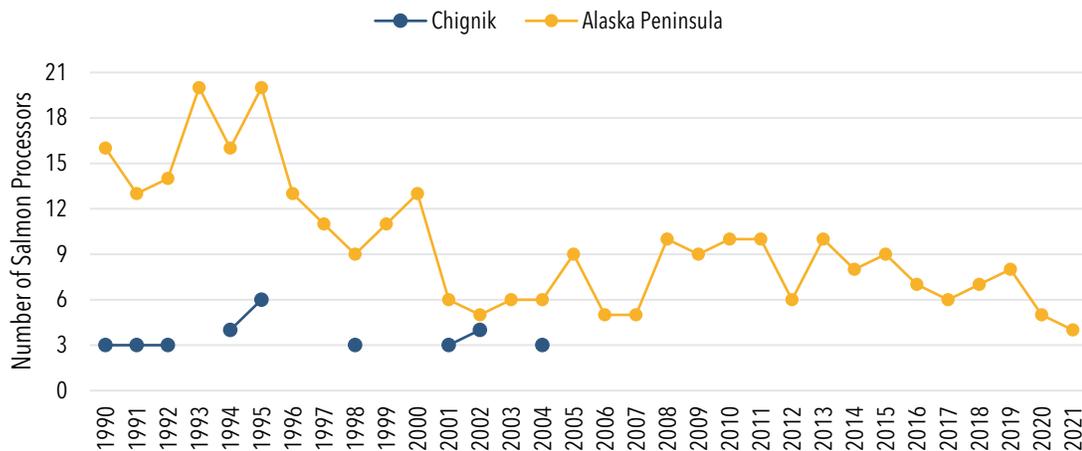
Source: Alaska Commercial Fisheries Entry Commission

Salmon Processor Activity

A small number of shoreside and floating processors operated out of the Chignik area in the 1990s and early 2000s, usually three processors in years when data are available. Since 2005, there have been fewer than three salmon processors operating in the region. The Alaska Department of Fish and Game redacts data about areas with fewer than three seafood purchasers to protect the confidentiality of the individual businesses.

The number of operating salmon processors also declined in the Alaska Peninsula in the past two decades, although there have always been at least four processors.

Figure 9. Number of Salmon Processors Operating in Chignik and Alaska Peninsula Areas, 1990-2021



Source Commercial Operators Annual Reports (COAR) production data, provided by Alaska Department of Fish & Game

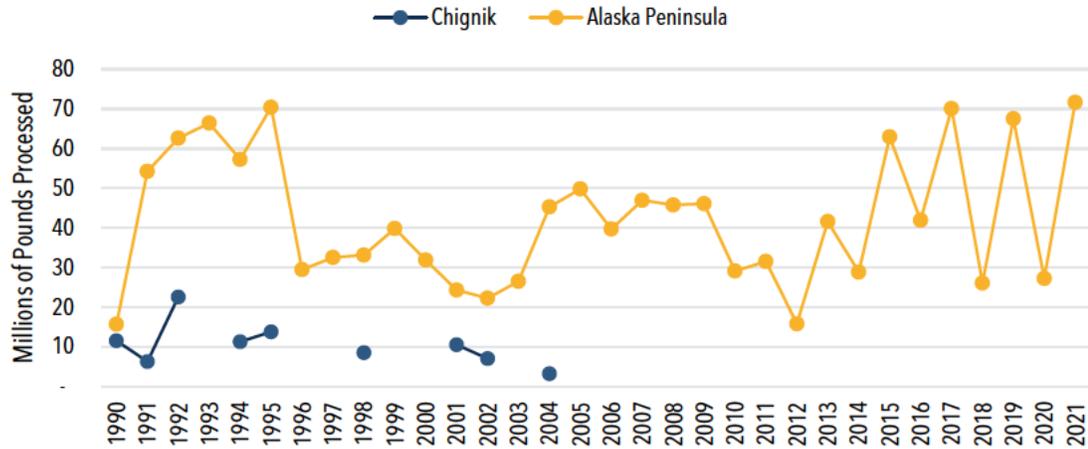
Note: Data for years when fewer than three processors operated are withheld to protect confidentiality. The hashed area at bottom of chart indicates that the processor count on years without data likely range between zero and 2.

Data on the volume of salmon produced by processors in each region show that although the number of processing plant declined in the Alaska Peninsula, the production volume has been relatively high. Salmon production in the Alaska Peninsula averaged more than 50 million pounds annually between 2017 and 2021.

In recent years, production volumes in the Alaska Peninsula have followed the two-year pattern of pink salmon abundance, with much stronger harvests and production volumes on odd-numbered years.

Production volume data for Chignik are limited by the low number of processors and data confidentiality. On years where production volumes are available, salmon production in the Chignik area averaged less than a third of the production volume of Alaska Peninsula seafood plants.

Figure 10. Wholesale Salmon Production (millions of pounds) in Chignik and Alaska Peninsula Areas

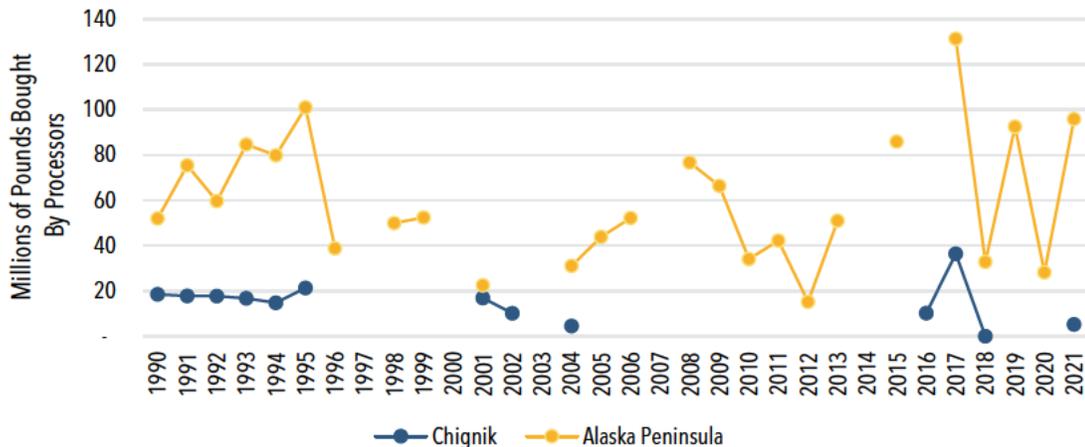


Source: Commercial Operator’s Annual Reports (COAR) production data provided by Alaska Department of Fish & Game

Ex-Vessel Salmon Harvests

Ex-vessel volumes shown in the figure below include the number of pounds of salmon purchased by processors based on the location of the harvest rather than the location of processing used in the figures above. In all years with available data between 1990 and 2021, the harvest volume was greater in the Alaska Peninsula area than in Chignik.

Figure 11. Ex-Vessel Salmon Harvest (millions of pounds) in Chignik and Alaska Peninsula Harvest Areas, 1990-2021



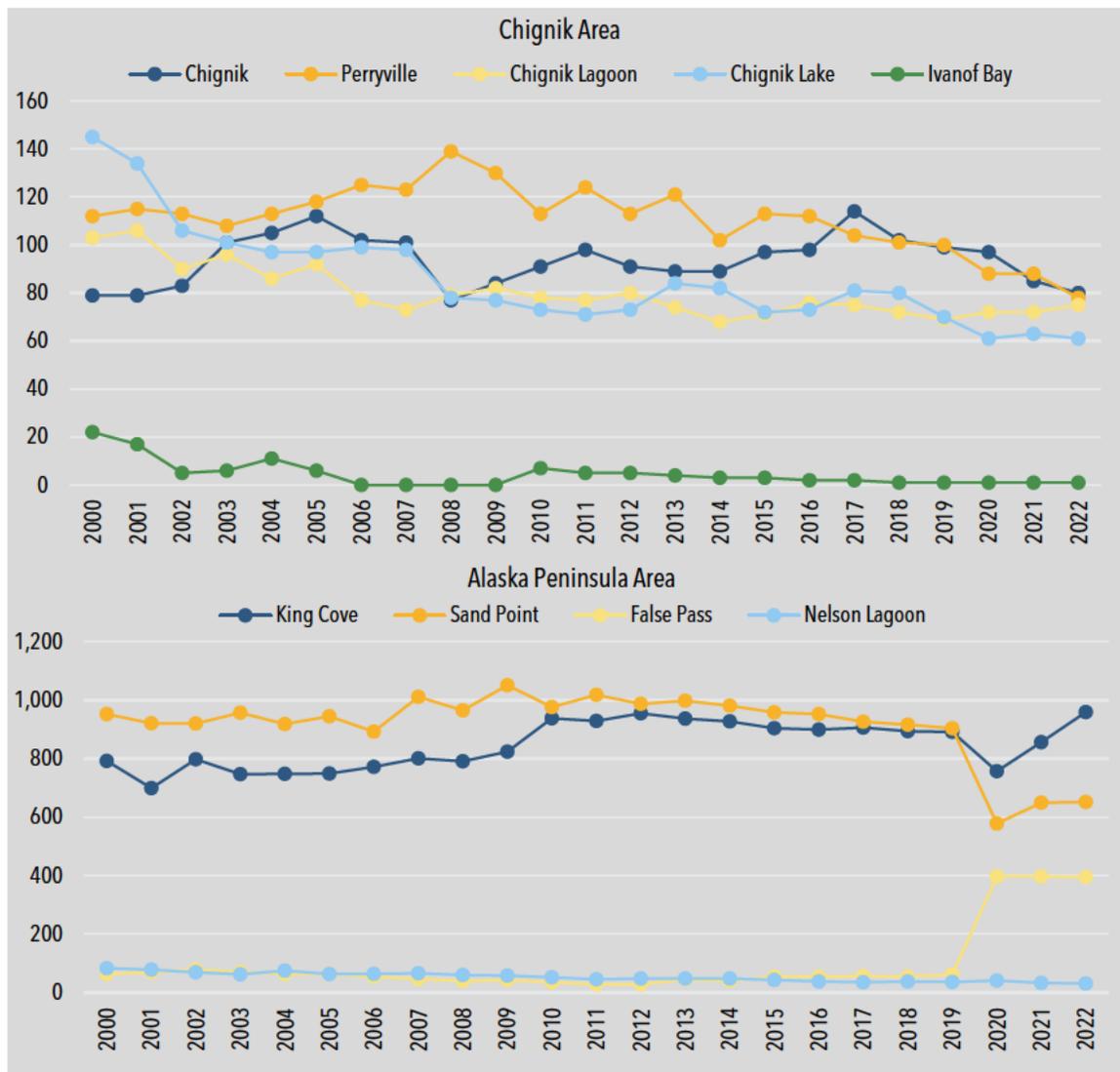
Source COAR buying data provided by Alaska Department of Fish & Game
 Note: Data for years when fewer than three buyers operated are withheld to protect confidentiality.

Population Trends in Chignik and the Alaska Peninsula

Community populations in the Chignik area declined steadily over the 2000-2022 period, in total dropping from 461 in 2000 to 295 in 2022 (a 46% decline), according to Alaska Department of Labor and Workforce Development estimates. The population declined in all five area communities in this period except for Chignik, also known as Chignik Bay.

In contrast, Alaska Peninsula communities increased in population from 1,891 to 2,037 during this period (an 8% increase). Populations shifted substantially because of seafood processing plants operational changes. Seafood plants are key employers in these communities.

Figure 12. Population of Communities in Chignik and Alaska Peninsula areas, 2000-2022.



Source: Alaska Department of Labor and Workforce Development

Submitted by: Luke Brockmann

Community of Residence: Juneau, AK

i am writing in so as to support propositions 117 and 118. steelhead are a dwindling resource with significant value to sport anglers. they are highly sought after worldwide for there unique characteristics, behaviors, and appearances. requiring commercial fishermen to report there incidental harvest of these fish will give biologists managing them a better understanding of there population numbers, run timings, and general whereabouts.

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is James Brown. I am a retired fisherman, apartment owner, and long-time community member in Sand Point. I have worked as an Area M seiner crew member and held a setnet permit.

Since the 1980s, there has been a steady reduction in fishing opportunity, and it has become increasingly difficult to make ends meet. Less fishing opportunity means less income and less ability to pay bills.

As a local property owner, I have lost tenants due to loss of fishing income. When people cannot earn a living, they leave, and the effects ripple through the entire community.

Area M has already reduced chum harvest through adaptive management, and further restrictions will only accelerate economic decline in communities that are already struggling.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Respectfully,

James Brown
Sand Point, Alaska



Submitted by: Chyonne Buterin

Community of Residence: Nelson Lagoon

This comment pertains to proposal 113. 5AAC 09.310(9). "Caribou Flats Section: from June 20 to July 31 by emergency order if the season ending sockeye salmon escapement in Nelson River is expected to be exceeded prior to August 1, fishing will be permitted with set and drift gillnet gear."

This proposal references 2024, when Nelson Lagoon (hereinafter, NLG) exceeded the upper escapement goal "...exceeded the upper escapement goal by almost 4-fold with

over 750,000 sockeye salmon escaping...the largest escapement ever recorded for the Nelson River."

However, this proposal provides no context behind these numbers. I believe that when speaking on topics such as these, especially in regard to small communities, context is not only suggested but necessary. The Alaska Department of Fish & Game website states that the cumulative escapement for the 2024 period, 06/09/24 - 07/22/24, totaled 729,766 once the weir was pulled. This differs greatly from the "...over 750,000..." statement above.

"The number of commercial salmon permits that are fishing in Nelson Lagoon has decreased substantially over the years and the effort levels are not capable of harvesting a good or strong return of sockeye salmon to the Nelson River." This statement falsely states that the numbers are solely due to the Nelson Lagoon Fishermen's efforts. Post-Salmon Season 2024, the Alaska Department of Fish & Game reported that 87% of the sockeye that escaped in the Nelson River were 1 and 2-year-old fish. The early return of these salmon is concerning, as it can negatively impact future seasons and potentially cause future devastation to the community. The Nelson Lagoon fishermen have stated that the average net used in the Nelson River measures $4 \frac{7}{8}$ inches. These nets are at a disadvantage with fish this small. Furthermore, fish of this size and age are not sustainable, not only for marketing but also for subsistence.

The caribou flats section has been closed for over 40 years. 2024 is the only year with such a large escapement compared to previous years and 2025. Even if a fleet were theoretically able to fish that section during the 2024 season, the same disadvantage would have taken place, unless the nets were smaller than $4 \frac{7}{8}$ inches. Still, the difference wouldn't be significant.

I believe it is important that we work together to maintain sustainable fishing. As smaller communities, we all rely on the land to sustain our lifestyles and livelihoods. We are sovereign, and to protect our lands, we need limits. At this time, this is not a sustainable choice and may cause more harm than good to our land. I oppose this proposal.

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

My name is Anthony George Cain, and I live in Cedar Hills, Utah. While I do not have a direct impact from the Area M fishery, as a Tribal member I am deeply concerned about how further restrictions would affect my fellow Tribal members and the communities that rely on this fishery.

Any time restrictions are put in place, they have an impact on all phases of the community as a whole. These restrictions limit progress and the ability for communities to maintain their way of life. They affect education, local businesses, and the overall stability of rural areas.

Fishing is a primary economic driver for these regions. Families, small businesses, and entire communities rely on fisheries for income, food security, and cultural continuity. Climate and habitat stressors are major drivers of declines and cannot simply be regulated away. Removing management tools and flexibility makes it harder to manage mixed-stock fisheries effectively, and further restrictions would hit small rural coastal communities the hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Sincerely,

Anthony George Cain
Cedar Hills, UT



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Michael Calugan, and I am a community member, Tribal Member / Subsistence user, and City/Borough Government employee from Sand Point, Alaska.

I lived between Anchorage and Sand Point during my school years but began living in Sand Point full time after I graduated. I moved back to Anchorage to take care of my mother while she was battling cancer, and I returned to Sand Point in September 2024 to raise my son and be a full-time member of the community. Since October 2024, I have worked as a night watchman for the harbor in Sand Point.

Reducing fishing time in Area M would not only affect my job, but it would also affect the lives of my friends and family here. A reduction in fishing opportunity could cause people to leave the community and could force the cannery to reduce operations or close altogether. That, in turn, would reduce the revenue the city depends on. It could also cause my position to become seasonal or lead to reduced hours week to week.

While not directly related to my own employment, we only need to look at what happened in King Cove after their cannery closed. People were forced to move, delivery costs increased, the cost of living rose, and the city lost revenue needed to support utilities and community services. Sand Point faces the same risks if further restrictions are imposed.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Salmon runs vary by river system, and not all poor runs share a single cause. Further restrictions would hit small rural coastal communities hardest.

Please consider the real impacts these decisions will have on working families, city services, and the long-term stability of communities like Sand Point.

Respectfully,

Michael Calugan
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I am a local business owner in Sand Point, in Aleutians East.

This would put my business out of business. Plus, I passed my permit down to my grandson for his livelihood. This would devastate his future. This would make Area M a region of ghost towns. There would be no income to survive. Our fisheries are the income.

There would be no businesses or schools, and no one could pay their utilities.

My business has gone down by 30% with the new restrictions. Plus, my grandson has a hard time making the overhead to maintain the boat and make a living.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management. This effort has been successful. Runs vary by river system; not all poor runs share a single cause. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Paula Calugan

[REDACTED]

Sand Point, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Peter Calugan of Sand Point, Alaska. My family has fished the Shumagin Islands since 1890, beginning with cod fishing. I am a fifth-generation fisherman in Area M and have grown up on boats my entire life, learning from my grandfathers and my dad.

At age 15, I had the opportunity to captain my grandparents' setnet boat, and I am now 17 years old. Commercial fishing is not just a job to me — it is a way of life that I hope to pass down to my own children.

Without commercial fishing in the summer, many community members would be forced to leave to find work elsewhere. School funding would be cut, city utilities would struggle, and we would not be able to continue living on our Unangax land as our ancestors once did.

I have already seen what happens when fish tax disappears. Our neighboring community of King Cove is struggling without a market. Without this fishery, I do not believe our community could survive.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, and 152.

Respectfully,

Peter Calugan
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I have been a fisherman my whole life. My community in Sand Point completely relies on salmon fishing and all fisheries. These proposals would mean that there is less financial income for my family and for school funding.

This would probably make me have to switch my career, which would break my heart because I feel as if I was born to do this. It is my family's and my people's way of life.

Standing down for chum hurts because it does not give us time to make money, and the month is hard enough as it is.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management. This effort has been successful. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and cannot be “regulated away.” Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Peter Calugan Jr

[REDACTED]

Sand Point, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I am a community member from King Cove in Aleutians East.

The loss of revenue and taxes would negatively affect our community, which would affect the money available for the city and borough.

There would be a significant loss of students, which means fewer school staff. There would be less money for public works jobs, which affects our household directly. Less money spent in businesses means less tax revenue to keep our city alive. It is already dying without a cannery. Don't take this away from us too.

No money, no fish, fewer opportunities, and less desire to live in a depressed area. There are fish. Let us live and thrive.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Climate and habitat stressors are major drivers of declines and can't be "regulated away." Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Annette Calver



King Cove, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I have lived in King Cove, Aleutians East, since 1985, for approximately 40 years.

People would be moving out if there is no fishing. The town would dry up because there would be no work.

The community would be decimated. There would be no community left. We have already lost half of our population when the cannery closed. If there were no fishing, people would have to move because they need to make a living.

They have reduced the fishing, which reduces income flowing into the community.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Further restrictions would hit small rural coastal communities hardest.

Sincerely,

Joe Calver

[REDACTED]

King Cove, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I am most connected to Sand Point, Alaska, although all communities in Area M will be impacted. I am Unangax. My family has called this area of the state home time immemorial.

Reducing or removing the Area M fishery would force my family to leave this community, as well as many families just like mine that rely on this fishery as a main source of income. We moved back because I wanted to raise my boys the way I was raised. I want them to learn the Unangan values I learned aboard a fishing boat. I want them to live off the land and learn the value of hard work. We will lose so much more than just the population, but an entire culture and way of living.

Our numbers at the school, where I currently teach in the winter, would dwindle. Many businesses and local services would not survive the reduction or removal of the Area M fishery. It will touch every area of this community and others just like it.

We have seen what the loss of a cannery has done to our friends and neighbors of King Cove. It is unimaginable to think about what losing an entire fishery could do to them and the rest of us who rely on it.

Further restrictions would hit small rural coastal communities hardest.

Regardless of how many comments you receive on this matter, reduced time or shutting down Area M fisheries will devastate this entire community and others just like it that rely on the Area M fishery to survive. Most importantly, it would also negatively impact the entire Unangan culture. Unangan values are passed on and instilled in the upcoming generations aboard fishing boats. Not only is fishing an integral piece of our identity as Unangan, it is how we fill our freezers, support our families, and it is the industry that keeps our villages running. Without commercial fishing, you would see this community and others in the Aleutians that our people have called home for generations slowly turn into ghost towns. We would have to leave home in order to find work, further removing us from our identity and culture. Many Unangan people who are fortunate enough to still reside in the Aleutians rely on the Area M fishery to live. If the Area M salmon fishery is to be shut down, you will lose communities and with it, an already endangered culture.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Dannielle Carlson


Sand Point, AK



CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

PC37

CIC Comments on Chignik Salmon Fishery Proposals

The CIC **SUPPORTS** proposals 108, 109, 110, & 111.

These are proposals developed by the Chignik AC, CIC, and Chignik fishermen to refine the Chignik Management Area (CMA) in order to decrease the opportunities for unintended harvest of local and non-local Chinook and non-local chums while still providing harvest opportunity for local sockeye.

Proposal 108: By closing the Western and Perryville District through July 5th, Proposal 108 will return the CMA to the pre-2008 regulations for managing the Western and Perryville Districts prior to July 5th. Although the harvest of non-local chums and Chinook has been minimal, with the catastrophic state of the AYK chum runs as well as the statewide failures of Chinook runs it just makes sense to avoid these areas in June to eliminate any possibility for unintended harvest of non-local chums or Chinook.

Proposal 109: By moving Jack Point into the Chignik Bay District and making it a new Statistical Area within the Chignik Bay District, Proposal 109 will restrict the Jack Point area to shallower and shorter seines like those used in Chignik Lagoon and would provide more management flexibility to increase fishing opportunity in an area close to home for local fishermen with smaller boats and gear. Chignik Lagoon is where most of the fishing effort and sockeye harvest occurs in the CMA. This is also where the majority of local residents fish, and have fished, for generations. Due to the Chinook crisis in Chignik, Chignik Lagoon has been restricted to 48 hrs. per week of fishing time in July the past 2 seasons despite a harvestable surplus of sockeye salmon in the Lagoon. This has resulted in a 71% reduction in fishing time for Chignik Lagoon fishermen, many of whom do not have boats or gear capable of fishing the outer capes.

Proposal 110: Seeks to reduce the maximum depth of seines outside the Chignik Bay District from 375 meshes plus 25 meshes of chafing gear in depth, to 325 meshes in depth *including* chafing gear. Chinook salmon tend to travel deeper than other salmon and making seines shallower is an attempt to further conserve Chinook salmon in the CMA.

Proposal 111: By splitting the Mitrofanina Island Area into Eastern and Western Sections, it gives ADF&G another tool for more precise management of the area to protect Chinook salmon that may be migrating through one Section at certain times while preserving harvest opportunities within the Section where Chinook salmon are not present. Splitting this area into separate Statistical Areas will also give ADF&G a better understanding of where salmon are being caught around the island as opposed to the current arrangement which lumps all salmon caught in the area together.



CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

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CIC Comments on SEDM Salmon Fishery Proposals

The CIC **SUPPORTS** proposals 120 & 126.

The CIC **OPPOSES** proposals 119, 121, 122, 123, 124, & 125, which will increase interception of Chignik-bound sockeye as well as other non-local stocks transiting the SEDM area.

The Southeast District Mainland (SEDM) fishery in Area M from June 1st through July 25th is managed based on the abundance and harvest of Chignik sockeye and has been for 40 years. This is because as many as 90% of the sockeye harvested in SEDM within that time spawn in Chignik (Eggers tagging study, June WASSIP, & ADF&G). Although ADF&G recognized the management linkage decades earlier and established the 80% Chignik stock assignment, the BOF officially codified it during the 1985 BOF meeting and developed the SEDM Management Plan, requiring the expectation of necessary minimum sockeye harvest levels in Chignik coupled with a fixed 7.6% harvest allocation to SEDM for two primary management objectives:

- **To Recognize & Address the Interception of Chignik-Bound Sockeye:**
 - SEDM waters catch a significant portion of sockeye salmon migrating to the Chignik River and the BOF recognized the vulnerability of Chignik stocks to overharvest in SEDM. The 7.6% allocation was designed to ensure that SEDM fishing opportunities would not exceed a defined share of the total Chignik sockeye harvest. The percentage was set based on historical harvest patterns and management policy goals. After July 25th, although Chignik stocks are still present, the SEDM fishery is managed primarily for local sockeye, pink, chum, & coho stocks, and the allocation no longer applies.
- **To Provide Chignik & SEDM Harvest Opportunity:**
 - The vulnerability of Chignik stocks to overharvest within the SEDM fishery led the BOF to establish minimum Chignik harvest thresholds (300,000/600,000 sockeye) within the allocation plan to ensure a sufficient economic basis for the Chignik fishery, thereby providing reasonable harvest opportunity for Chignik & SEDM while protecting migrating Chignik stocks.

CIC Supports the following:

Proposal 120: Will exclude seine vessels from SEDM through July 25. Current regulations exclude seiners through July 10. This proposal will provide SEDM set netters more fishing time.

Proposal 126: Although seemingly complex, it is a simple proposal that seeks to include the Volcano Bay/Dolgoi Is. Section into the current SEDM District & Management Plan. The 2004 remake of the Area M June fishery opened this previously closed area and provided new June impact on Chignik returns where none previously existed. That new exploitation is not linked to conservation when Chignik stocks do not meet escapement. Reconfiguring these areas into SEDM and the 7.6% allocation plan linkage is critical for Chignik stock conservation.



CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565



Date: April 8, 2019
To: Chuck McCallum, CRAA Executive Director
From: McDowell Group
RE: Chignik Sockeye Value Analysis

McDowell Group was asked to consider how many Chignik sockeye salmon would need to be harvested today to equal the inflation-adjusted revenue associated with harvest of 300,000 sockeye in the late-1970s. This analysis focuses on the Chignik seine fleet operating with a S 01L limited entry permit.

Analysis

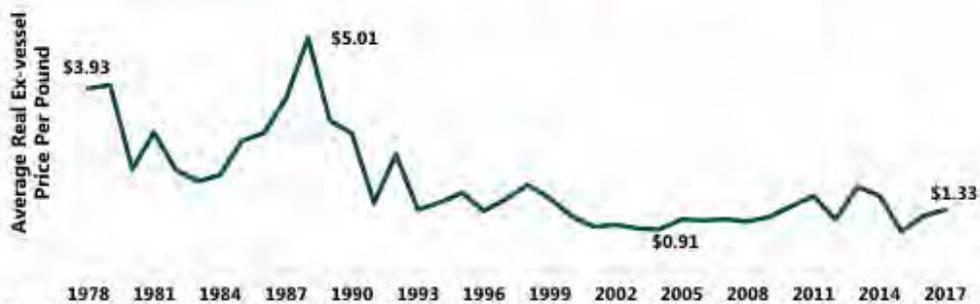
This analysis investigates how the per-fish value of sockeye has changed over the past 40 years relative to changes in the cost of living in Alaska as measured by the Bureau of Labor Statistics Urban Alaska Consumer Price Index (CPI). This is the best available measure of inflation trends in Alaska.

The Urban Alaska CPI increased from 70.2 to 218.9 between 1978 and 2017. That means the dollar in 2017 was worth about one-third of the dollar in 1978, in terms of purchasing power.

Inflation has increased much faster than the average price of sockeye salmon over the 1978 to 2017 period. With inflation averaging 2.9 percent annually over that period, ex-vessel sockeye prices in real (inflation-adjusted) dollars declined at an average rate of 2.7 percent annually. In 1978, Chignik sockeye was priced at \$1.26 per pound (in 1978 dollars). The 2017 equivalent of that 1978 price is \$3.93, however, the actual price paid in 2017 was \$1.33.

The highest real (2017 dollars) price observed over this 40-year period was \$5.01 per pound in 1988. The 2017 value of \$1.33 per pound is above the period-low of \$0.91 in 2004, but well below the 1978 price (in 2017 dollars) of \$3.93.

Average Estimated Real Ex-vessel Price (in 2017 dollars) per Pound of Sockeye Harvested by Chignik Seine Fleet, 1978-2017



Note: Due to confidentiality restrictions, data for some years is not available. McDowell Group estimated the value for these years using other publicly available data.
 Sources: Alaska Department of Labor and Workforce Development, Cost of Living Information; Alaska Department of Fish and Game, Commercial Fishing Division; McDowell Group calculations.



Results

Based on an estimated price of \$1.26 per pound in 1978, harvest of 300,000 sockeye weighing an average of 7.90 pounds would have generated \$2.98 million in total ex-vessel value. Adjusting for inflation, this revenue is equivalent to \$9.29 million in 2017 dollars.

An analysis of per-fish value change over time must also reflect the declining average weight of Chignik sockeye. The average weight in 2017 was 6.13 pounds, about 22 percent lower than the 1978 average.

Harvest of 300,000 in 2017 — with an average weight of 6.13 pounds and ex-vessel price of \$1.33 per pound — would have generated \$2.43 million in total ex-vessel value. To maintain equivalency with the value of salmon harvested in 1978, harvest of roughly 839,000 additional salmon would have been required in 2017. In other words, a harvest of approximately 1.139 million sockeye salmon would be required in 2017 to generate the equivalent of the 1978 ex-vessel revenue of \$9.29 million.

Other scenarios are detailed in the following table.

Equivalent Harvest Volume and Values Between 1978 and 2017

Number of fish in 1978	1978 Nominal Ex-vessel Value	Equivalent 2017 Real Ex-vessel Value	Number of Fish Required in 2017 to Produce Equivalent Value, at 2017 Price
300,000	\$2,979,000	\$9,289,000	1,139,000
600,000	\$5,958,000	\$18,577,000	2,279,000
900,000	\$8,938,000	\$27,866,000	3,418,000
1,200,000	\$11,917,000	\$37,155,000	4,557,000

Note: values have been rounded.
 Source: McDowell Group estimates.

Sources

Data on ex-vessel salmon prices and average weight of sockeye salmon harvested in the Chignik seine fishery are from the Alaska Department of Fish & Game. Inflation adjustments are based on the Urban Alaska Consumer Price Index from the United States Bureau of Labor Statistics.



CHIGNIK INTERTRIBAL COALITION
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PC37

CIC Comments on Area M South Peninsula June Fishery Proposals

The CIC **SUPPORTS** Proposals 130, 133, & 136.

The CIC **OPPOSES** Proposals 128, 129, 134, 135, & 137.

The CIC **SUPPORTS** the intent to lengthen closures in the South Peninsula June fishery in Proposals 127, 131, and 132, but does **NOT SUPPORT** the dates suggested in the proposals.

CIC Supports the following:

Among the proposals supported by the CIC, Proposals 130 & 133 are particularly important. Both provide BOF members & the public clear documentation of the stocks being harvested in Area M in June and their stock of origin.

1) Proposal 130: Addresses the 2004 BOF action that more than doubled the historic fishing time for the Shumagin Islands June fishery. Existing June regulations do not provide closures of sufficient duration to allow the uninterrupted passage of migrating stocks, including Chignik-bound sockeye, through the area. This fishing time increase, coupled with changes in Bristol Bay sockeye migration patterns, results in the Shumagin Islands in some years intercepting greater proportions of sockeye originating from Chignik, Kodiak, and Cook Inlet than in the past. It has also resulted in an increase in non-local chum & Chinook harvests.

2) Proposal 133: Offers the same solutions to the increase in interception of non-local chum, Chinook & sockeye stocks created by the 2004 BOF action as addressed in Proposal 130 but applies them to the *entire* South Peninsula June Fishery.

Proposal 136: Would close the June fishery in the South Peninsula. This makes sense since the June fishery intercepts high numbers of stocks that are bound for areas that do not have enough of their own stocks returning to have a commercial fishery, or a subsistence fishery, or even make escapement in some areas. Several fisheries are heavily restricted and forgoing harvest of their healthy stocks in an attempt to meet their escapement goals for local stocks that are severely depressed. The June fishery in the South Peninsula should not be exempt from any significant conservation burden while so many other areas they impact suffer the consequences.

CIC Opposes the following:

Proposal 128: Relies on caps, thresholds, and triggers that cannot be implemented reliably due to the prevalence of chum chucking and under reporting of Chinook harvests. It is not the responsibility of Western Alaska (AYK), Kodiak, Cook Inlet, or Chignik fisheries to demonstrate what Area M fishers harvest. The burden of proof should rest with Area M fishing groups. Assertions that onboard cameras or observers could adequately assess Chinook and chum bycatch are misleading. There is no funding for 100% observer coverage, nor sufficient staff capacity to review and analyze the volume of onboard camera footage that would be generated.



**CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565**

PC37

Proposal 129: Relies on chum harvest caps which can't be implemented reliably due to the prevalence of chum chucking. It also has a fishing schedule that makes no sense and would create a new interception fishery in early July that currently doesn't exist.

Proposal 134: Seeks to go back to the pre-2023 fishing schedule in the South Peninsula June fishery, which would result in an increase in fishing time and a reduction in closure times to allow migrating stocks to pass by. With the amount of salmon stocks that are struggling to even make escapement, any expansion of an interception fishery is not consistent with the "Policy for Management of Sustainable Salmon Fisheries" (SSFP:5AAC 39.222) and the "Mixed Stock Salmon Policy" (5AAC 30.220).

Proposal 135: The Commissioner already has authority to require non-retention. This proposal is just an attempt to codify State sanctioned Chinook chucking. With the history of chum chucking in the South Peninsula June fishery, it would be difficult for enforcement to tell if it is Chinook or chums being tossed over the side. With the current depressed state of Chinook runs everywhere, it makes more sense to require retention of all Chinook harvested throughout the season rather than further diminish the knowledge of how many Chinook are actually harvested in the South Peninsula salmon fishery.

Proposal 137: Set net fishermen already have more fishing time than any other gear group in Area M, enjoy more fishing time and area currently than they did before 2004, and expanding their interception fishery even further than this unprecedented level of fishing time is not consistent with the "Policy for Management of Sustainable Salmon Fisheries" (SSFP:5AAC 39.222) and the "Mixed Stock Salmon Policy" (5AAC 30.220).



CHIGNIK INTERTRIBAL COALITION
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CIC Comments on Area M South Peninsula Post-June Fishery Proposals

The CIC **SUPPORTS** Proposal 140, & Proposal 143 as amended by the Chignik AC.

The CIC **OPPOSES** Proposals 138, 146, 139, 142, 144, & 145.

CIC Supports the Following:

Proposal 140: There are Sections in the Area M South Peninsula salmon fishery where “terminal harvest” areas extend 15+ miles offshore. This is a tremendous amount of area that allows for substantial interception of non-local sockeye stocks when fishermen are supposed to be limited to a terminal harvest area based on the abundance of local pink and chum salmon stocks. This proposal will divide these Sections into inner and outer areas, with the inner area representing a more realistic terminal harvest area as seen in other areas around the State.

Proposal 143: The Chignik AC, in part through discussion with ADF&G Westward Region staff, approved an amended version of this proposal, which the CIC also supports. The current test fishery does not accurately assess the number of immature Chinook present in the South Peninsula Post-June fishery, and the amended version of this proposal attempts to rectify that situation in the simplest way possible.

CIC Opposes the following:

Proposals 138 & 146: Both proposals seek to significantly expand fishing time for set gillnet fishermen only in the South Peninsula during July. Proposal 136 would result in an 84% increase in fishing time while Proposal 146 would result in a 33% increase in fishing time. A high number of Chignik sockeye are present in the area throughout July, and any increase in fishing time in July would negatively impact Chignik sockeye stocks, especially increases of this magnitude. ADF&G also noted these proposals “would reduce the likelihood of achieving sustainable escapement levels and could exploit certain portions of a given run.”

Proposal 139: This proposal would basically create a scheduled August fishery based solely on the abundance of pink salmon in the Southeastern District rather than managing fishing periods based on the strength of local sockeye, coho, pink, and chum like the current management plan does. This is a bad idea and creates the potential for negative impacts on local sockeye, coho and chum in the area. It will also create more harvest opportunity for non-local stocks still present in the area, such as Chignik sockeye (WASSIP).

Proposals 142, 144, and Proposal 145: These proposals would result in increased fishing time and area, which could impede ADF&G’s ability to manage for escapement based on local stocks and lead to an increased harvest in all salmon in the area. Chignik sockeye stocks are present in the South Peninsula and Shumagin Islands in August (WASSIP) and any increase in fishing time and harvest will naturally increase the harvest of Chignik stocks.



CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

PC37

CIC Comments on Area M Gear Proposals

The CIC **SUPPORTS** Proposals 147, 151, 148 & 152.

The CIC **OPPOSES** Proposals 149, 150, & 153.

CIC Supports the following:

Proposal 147: Seeks to reduce the maximum depth of set and drift gillnets in the South Peninsula of Area M from 90 meshes in depth, to 70 meshes in depth. This will make the gillnet depth restrictions in the South Peninsula the same as those of the North Peninsula. Chinook and chum salmon tend to travel deeper than other salmon and making gillnets shallower should be used to protect migrating Chinook and chum salmon stocks.

Proposal 151: This proposal would repeal the regulations adopted in 2023 that granted the set gillnet fleet an extra 25 fathoms of fishing gear, in the form of seine web. The argument was that the seine web “lead” was necessary to make fishing easier and safer when the weather is bad. What was not realized by some Board Members was the fact that current regulations allow the shoreward end of a set gillnet to be anchored up to one-half mile from the mean high tide mark. Basically, these fishermen were granted an extra 25 fathoms of fishing gear to increase their catching power and thus their ability to intercept more non-local stocks. Not only does that decision contradict the “Policy for Management of Sustainable Salmon Fisheries” (SSFP:5AAC 39.222) and the “Mixed Stock Salmon Policy” (5AAC 30.220) but it also created the opportunity for an increase in immature salmon being gilled in the seine web now attached to the set gillnet. As set gillnetters are currently exempt from the consequences of the immature salmon test fishery in Area M, this issue needs to be addressed.

Proposals 148 & 152: These proposals are identical and call for the reduction in length and depth of the seine gear in Area M. Shorter and shallower seines will reduce the killing power of the seine fleet and coupled with longer closures can help reduce the interception and bycatch of struggling non-target stocks, including AYK chum, Chignik-bound sockeye, and Chinook migrating through the area.

CIC Opposes the following:

Proposal 149: This proposal would double the length of set gillnets in Area M. With all the Stocks of Concern in Alaska, and the overall desperate state of Chinook stocks all over, the last thing that should happen in a heavy intercept fishery is an expansion of killing power by increasing the size of their nets.

Proposals 150 & 153: These proposals aim to improve the killing power of set gillnets in the South Peninsula by allowing the use of monofilament web. Again, the current state of Alaska’s fisheries do not call for an increase of killing power in a heavy intercept fishery.



CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

PC37

opposition to the “Policy for Management of Sustainable Salmon Fisheries” (SSFP:5AAC 39.222) and the “Mixed Stock Salmon Policy” (5AAC 30.220).

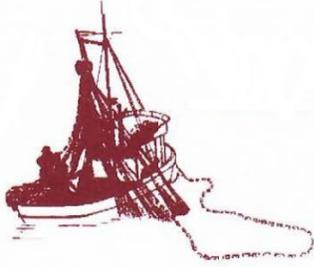
The half-measures put in by ADF&G in the 2025 season in the South Peninsula of Area M in July were ineffective in curbing the harvest of migrating Chinook stocks through the area, as evidenced by the harvest of 15,065 Chinook in the Post-June fishery alone (*excluding* those caught in SEDM July 6-25). The purse seine fleet harvested 96% of that total.

It is abundantly clear that more protection needs to be afforded to critically endangered Chinook stocks as they migrate through Area M on their way home to their natal rivers. Shorter & shallower fishing gear, accurate, transparent & timely salmon harvest information, longer closures, and an actual management plan that acknowledges & protects Chinook stocks traversing Area M are necessary for that to happen. Proposal 141 is a start in that direction.

Submitted by: Callen Christensen

Community of Residence: Fairbanks

We are actively see the destruction of communities that rely on salmon as a food source. Alaskan citizens are being snubbed by the hands of commercial fishing, which while does employ Alaskans, are often owned by Outside corporations. Additionally the food is not feeding Alaskans. Subsistence priority should always be the priority.



City of False Pass

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 Telephone (907)548-2319 ~ Fax (888)433-6444
cityoffalsepass@ak.net

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

The City of False Pass submits this written public testimony to express strong opposition to proposals that would further restrict Area M salmon seine fisheries and to reaffirm our support for the current adaptive management framework adopted by the Board in 2023.

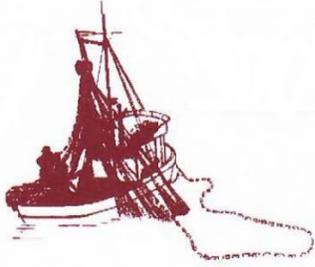
False Pass is a remote Alaska Peninsula community whose continued existence depends on access to commercial fisheries. Salmon fisheries are the primary economic driver for our community, supporting local residents, non-resident crew employment, municipal revenues, and essential services. In a community of fewer than 80 residents, commercial fishing activity directly or indirectly supports a substantial portion of local households.

Area M salmon seine fisheries provide employment for approximately 70% of in region permit holders who are culturally tied to the region and crew who either reside in False Pass or rely on the community for seasonal work, processing, fuel, moorage, and logistical support. During the fishing season, fleet participation brings critical economic activity into the community, sustaining local businesses and generating revenues that support municipal operations, including infrastructure maintenance, public safety, and community services. Any reduction in fishing opportunity has immediate and disproportionate consequences for False Pass, where there are no comparable alternative industries.

The City of False Pass strongly supports **Proposals 107, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, and 154**, which maintain reasonable access to fisheries while allowing for in season management and conservation responsiveness.

We oppose **Proposals 108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 136, 140, 148, and 152**, which would impose additional restrictions or closures without sufficient biological justification and without consideration of cumulative socioeconomic impacts.

Of particular concern is **Proposal 136**, which would eliminate the June fishery entirely. The June fishing period is a critical component of the Area M seine season and provides early-season income that supports fishermen's ability to operate throughout the year. A complete June shutdown would result in lost income, reduced crew employment, decreased local spending, and increased financial instability for both fishermen and the municipality. For False Pass, the loss of an entire fishing period is not a minor adjustment, it represents a direct threat to community sustainability. This is our survival. The direct impacts to the local economy are astounding. There have been years that June alone fishing accounted for more than 15% of the City's annual revenues. When those numbers are diminished, it means cuts to our public utilities, such as water and electric, as well as possible increased user fees. The residents will suffer the impacts.



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From both a technical and management perspective, further closures are unwarranted. The Alaska Board of Fisheries adopted an Adaptive Management Plan in 2023 specifically to address conservation concerns while preserving fishing opportunity. That plan provides managers with effective tools, including escapement-based triggers, in season monitoring, emergency order authority, and time-and-area management. These measures are actively being implemented and are proving effective in meeting conservation objectives without unnecessary disruption to fishing communities.

Importantly, **no new scientific information** has been presented that justifies additional seasonal closures or more restrictive measures beyond those already in place. Broad, preemptive shutdowns, such as those proposed, undermine the adaptive framework adopted by this Board and replace responsive management with blunt regulatory action. This approach is inconsistent with sound fisheries management and ignores the demonstrated effectiveness of the current plan. For False Pass, maintaining the status quo under the existing adaptive management structure is essential. Stability and predictability in management allow fishermen, processors, and municipalities to plan, invest, and operate responsibly while continuing to meet conservation goals. Repeated regulatory reductions erode community resilience and push small coastal communities closer to economic collapse.

We respectfully urge the Board to uphold the adaptive management approach adopted in 2023, reject proposals that eliminate or unnecessarily restrict fishing opportunity, and recognize that the long-term sustainability of Alaska's fisheries depends not only on healthy fish stocks, but on the survival of the communities that depend upon them.

Thank you for the opportunity to provide testimony and for your consideration of the people and communities of Area M.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nicole Hoblet', written over a light blue background.

Nicole Hoblet, Mayor

CFEC Permit Holdings and Estimates of Gross Earnings in the Chignik and Alaska Peninsula Commercial Salmon Fisheries, 1975-2024

CFEC Report Number 26-01N
February 2026

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

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- 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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Abstract

Limited entry permit holdings in the Chignik and Alaska Peninsula salmon fisheries are examined: the Chignik purse seine fishery (S01L permits) is first, followed by a separate examination of the Alaska Peninsula fisheries that include purse seine (S01M permits), drift gillnet (S03M permits), and set gillnet (S04M permits). This report provides summary statistics on the number of permit holdings, permanent and emergency transfers of permits, permit value, permit latency, new entrants in the fisheries, permit holder mean age, estimated gross earnings, vessel characteristics for the drift and purse seine fisheries, and Department of Natural Resource shore fishery leases in the set gillnet fishery. Some summary statistics are also presented by resident type. A description of the computer files and methods used to generate statistics are provided.

Prepared by Sally Kohlhasse

Acknowledgements

Special thanks to Reid Johnson for his insights and contributions to this document.

Contents

Abstract	2
Acknowledgements	2
<i>Introduction</i>	7
Description of the Data Files Used to Generate This Report	8
CFEC Permit File	8
CFEC Census File	8
CFEC Gross Earnings File	8
CFEC Vessel File	9
DNR Shore Fishery Lease Data File	9
Data Display	9
<i>Chapter 1 Chignik Salmon Purse Seine Fishery</i>	10
S01L Permit Holdings	10
Transfers of S01L Permits	11
Emergency Transfers of S01L Permits	111
Latent S01L Permits	13
New Entrants into the Chignik Salmon Purse Seine Fishery	14
Age of S01L Permit Holders	15
S01L Permit Value	16
Chignik Salmon Purse Seine Vessel Characteristics	167
Participation and Earnings	19
<i>Chapter 2 Alaska Peninsula Purse Seine Fishery</i>	22
S01M Permit Holdings	22
Transfers of S01M Permits	22
Emergency Transfers of S01M Permits	233
Latent S01M Permits	244
New Entrants into the Alaska Peninsula Salmon Purse Seine Fishery	255
Age of S01M Permit Holders	27
S01M Permit Value	28
Alaska Peninsula Salmon Purse Seine Vessel Characteristics	29
Participation and Earnings	31
<i>Chapter 3 Alaska Peninsula Salmon Drift Gillnet Fishery</i>	33
S03M Permit Holdings	34
Transfers of S03M Permits	344
Emergency Transfers of S03M Permits	355
Latent S03M Permits	366
New Entrants into the Alaska Peninsula Salmon Drift Gillnet Fishery	377
Age of S03M Permit Holders	39
S03M Permit Value	40
Alaska Peninsula Salmon Drift Gillnet Vessel Characteristics	41
Participation and Earnings	43
<i>Chapter 4 Alaska Peninsula Salmon Set Gillnet Fishery</i>	46
S04M Permit Holdings	46
Transfers of S04M Permits	466
Emergency Transfers of S04M Permits	477
DNR Shore Fishery Leases in the Alaska Peninsula Set Gillnet Fishery	488
Latent S04M Permits	51
New Entrants into the Alaska Peninsula Salmon Set Gillnet Fishery	52
Age of S04M Permit Holders	53
S04M Permit Value	54
Participation and Earnings	55

List of Tables

Table 0-1. Percent of Total Ex-vessel Value of Chignik and Alaska Peninsula Salmon Fisheries by Species, 1975-2024 7

Table 0-2. Communities Local to the Chignik Salmon Fisheries, as Indicated in the CFEC Census File 8

Table 0-3. Communities Local to the Alaska Peninsula Salmon Fisheries, as Indicated in the CFEC Census File 8

Table 1-1. Initial Issuance and Year-end 2024 Totals of Chignik Salmon Purse Seine Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type 10

Table 1-2. Transfer Acquisition Methods for Chignik Salmon Purse Seine Permits, 1980-2024 11

Table 1-3. Relationships of Transferor to Transfer Recipients for Chignik Salmon Purse Seine Permits, 1980-2024 11

Table 1-4. Use of Emergency Transfer Permits in the Chignik Salmon Purse Seine Fishery, 1975-2024 12

Table 1-5. Chignik Salmon Purse Seine Permit Latency, 1975-2024 13

Table 1-6. New Entrants into the Chignik Salmon Purse Seine Fishery, 1975-2024 14

Table 1-7. Median Age of Select CFEC Permit Holders and the General Alaskan Population 15

Table 1-8. CFEC Estimated Value of Chignik Salmon Purse Seine Permits 16

Table 1-9. Chignik Salmon Purse Seine Vessel Characteristics 17

Table 1-10. Additional Chignik Salmon Purse Seine Vessel Characteristics 18

Table 1-11. Estimated Total Gross Earnings (Real and Nominal) for the Chignik Salmon Purse Seine Fishery, With Average Earnings (Real) by Permit, 1975-2024 20

Table 1-12. Estimated Real Gross Earnings for Permit Holders in the Chignik Salmon Purse Seine Fishery by Resident Type, 1975-2024 21

Table 2-1. Initial Issuance and Year-end 2024 Totals of Alaska Peninsula Salmon Purse Seine Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type 22

Table 2-2. Transfer Acquisition Methods for Alaska Peninsula Salmon Purse Seine Permits, 1980-2024 22

Table 2-3. Relationships of Transferor to Transfer Recipients for Alaska Peninsula Salmon Purse Seine Permits, 1980-2024 23

Table 2-4. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Purse Seine Fishery, 1975-2024 23

Table 2-5. Alaska Peninsula Salmon Purse Seine Permit Latency, 1975-2024 24

Table 2-6. New Entrants into the Alaskan Peninsula Salmon Purse Seine Fishery, 1975-2024 25

Table 2-7. Median Age of Select CFEC Permit Holders and the General Alaskan Population 27

Table 2-8. CFEC Estimated Value of Alaska Peninsula Salmon Purse Seine Permits 28

Table 2-9. Alaska Peninsula Salmon Purse Seine Vessel Characteristics 29

Table 2-10. Additional Alaska Peninsula Salmon Purse Seine Vessel Characteristics 30

Table 2-11. Estimated Total Gross Earnings (Real and Nominal) for the Alaska Peninsula Salmon Purse Seine Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2024 32

Table 2-12. Estimated Real Gross Earnings for Permit Holders in the Alaska Peninsula Salmon Purse Seine Fishery by Resident Type, 1975-2024 33

Table 3-1. Initial Issuance and Year-end 2024 Totals of Alaska Peninsula Salmon Drift Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type 34

Table 3-2. Transfer Acquisition Methods for Alaska Peninsula Salmon Drift Gillnet Permits, 1980-2024 34

Table 3-3. Relationships of Transferor to Transfer Recipients for Alaska Peninsula Salmon Drift Gillnet Permits, 1980-2024 35

Table 3-4. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024 35

Table 3-5. Alaska Peninsula Salmon Drift Gillnet Permit Latency, 1975-2024 36

Table 3-6. New Entrants into the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024 37

Table 3-7. Median Age of Select CFEC Permit Holders and the General Alaskan Population 39

Table 3-8. CFEC Estimated Value of Alaska Peninsula Salmon Drift Gillnet Permits 40

Table 3-9. Alaska Peninsula Salmon Drift Gillnet Vessel Characteristics 41

Table 3-10. Additional Alaska Peninsula Salmon Drift Gillnet Vessel Characteristics 42

Table 3-11. Estimated Total Gross Earnings (Real and Nominal) for the Alaska Peninsula Salmon Drift Gillnet Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2024 44

Table 3-12. Estimated Real Gross Earnings for Permit Holders in the Alaska Peninsula Salmon Drift Gillnet Fishery by Resident Type, 1975-2024 45

Table 4-1. Initial Issuance and Year-end 2024 Totals of Alaska Peninsula Salmon Set Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type 46

Table 4-2. Transfer Acquisition Methods for Alaska Peninsula Salmon Set Gillnet Permits, 1980-2024 46

Introduction

Table 4-3. Relationships of Transferor to Transfer Recipients for Alaska Peninsula Salmon Set Gillnet, 1980-2024 47

Table 4-4. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Set Gillnet Fishery, 1975-2024 47

Table 4-5. Alaska Peninsula Salmon Set Gillnet DNR Shore Fishery Leases by District 50

Table 4-6. Alaska Peninsula Salmon Set Gillnet Permit Latency, 1975-2024 51

Table 4-7. New Entrants into the Alaska Peninsula Salmon Set Gillnet Fishery, 1975-2024 52

Table 4-8. Median Age of Select CFEC Permit Holders and the General Alaskan Population 53

Table 4-9. CFEC Estimated Value of Alaska Peninsula Salmon Set Gillnet Permits 54

Table 4-10. Estimated Total Gross Earnings (Real and Nominal) for Alaska Peninsula Salmon Set Gillnet Fishery, With Average
Gross (Real) Earnings by Permit, 1975-2024 56

Table 4-11. Estimated Real Gross Earnings for Permit Holders in the Alaska Peninsula Salmon Set Gillnet Fishery by Resident Type,
1975-2024 57

List of Figures

Figure 1-1. Use of Emergency Transfer Permits in the Chignik Salmon Purse Seine Fishery, 1975-2024	12
Figure 1-2. Chignik Salmon Purse Seine Permit Latency Rate, 1975-2024	13
Figure 1-3. New Entrants into the Chignik Salmon Purse Seine Fishery, 1975-2024	14
Figure 1-4. Estimated Nominal and Real Average Gross Earnings Per Chignik Salmon Purse Seine Permit	19
Figure 2-1. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Purse Seine Fishery, 1975-2024	24
Figure 2-2. Alaska Peninsula Salmon Purse Seine Permit Latency Rate, 1975-2024	25
Figure 2-3. New Entrants into the Alaska Peninsula Salmon Purse Seine Fishery, 1975-2024	26
Figure 2-4. Estimated Nominal and Real Average Gross Earnings Per Alaska Peninsula Salmon Purse Seine Permit	31
Figure 3-1. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024	36
Figure 3-2. Alaska Peninsula Salmon Drift Gillnet Permit Latency Rate, 1975-2024	37
Figure 3-3. New Entrants into the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024	38
Figure 3-4. Estimated Nominal and Real Average Gross Earnings Per Alaska Peninsula Salmon Drift Gillnet Permit	43
Figure 4-1. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Set Gillnet Fishery, 1975-2024	48
Figure 4-2. Count of Permits with DNR Shore Fishery Leases by District on the Alaska Peninsula, 1975-2024	49
Figure 4-3. New Entrants into the Alaska Peninsula Set Gillnet Salmon Fishery, 1975-2024	52
Figure 4-4. Estimated Nominal and Real Average Gross Earnings Per Alaska Peninsula Salmon Set Gillnet Permit.....	55

Introduction

Commercial fishing for salmon in Chignik and on the Alaska Peninsula has been documented as far back as 1888 in Chignik (Area L) and 1906 on the Alaska Peninsula (Area M)¹. Today, three gear types are used to prosecute the commercial salmon fisheries in this region: purse seines in both Chignik and the Alaska Peninsula, plus drift and set gillnet gear for the Alaska Peninsula.

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.

The Chignik purse seine, and all three commercial Alaska Peninsula (purse seine, drift gillnet, and set gillnet) fisheries were in the original group of salmon fisheries that were limited. Limited permits in these fisheries were issued starting 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.

Information regarding season length, openings and closings, size, alternate gear and methods, and other such data can be found in the Alaska Department of Fish and Game's (ADF&G) 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 Chignik and Alaska Peninsula 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 the commercial salmon fisheries from year to year and across each fishery.

Table 0-1. Percent of Total Ex-vessel Value of Chignik and Alaska Peninsula Salmon Fisheries by Species, 1975-2024

Species	Chignik Purse Seine	AK Peninsula Purse Seine	AK Peninsula Drift Gillnet	AK Peninsula Set Gillnet	All Combined
Chinook	0.5%	0.6%	0.7%	1.5%	0.7%
Sockeye	83.7%	42.8%	92.1%	83.6%	73.0%
Coho	4.4%	4.4%	2.3%	6.6%	4.0%
Pink	7.4%	36.5%	0.4%	3.7%	14.3%
Chum	4.0%	15.8%	4.6%	4.5%	8.0%

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

Description of the Data Files Used to Generate This Report

Several CFEC data files were used to generate the statistics in this report: the permit file, the census file, the vessel file, the Alaska Department of Natural Resources (DNR) shore fishery lease file, and the gross earnings file. The most recently 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 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. Tables 0-2 through 0-6 list the communities that are currently designated as local to salmon commercial fisheries in the Census file.

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

Chignik	Chignik Bay	Chignik Lagoon	Ivanoff Bay	Perryville
---------	-------------	----------------	-------------	------------

Table 0-3. Communities Local to the Alaska Peninsula Salmon Fisheries, as Indicated in the CFEC Census File

Adak	Chernofski	Makushin	Saint Paul Island	St. Paul
Akutan	Cold Bay	Nelson Lagoon	Sanak	Umnak Island
Amchitka	Dutch Harbor	Nikolski	Sand Bay	Unalaska
Atka	False Pass	Paylof Habor	Sand Point	Unalaska
Attu	Fort Glenn	Port Heiden	Shemya	Unimak
Attu Station	Herendeen Bay	Port Moller	Squar Harbor	
Belkofski	King Cove	Saint George Island	St. George	

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.

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.

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 data set. Creation of the dataset is described in CFEC Report Number 19-03N, *CFEC Salmon Set Gillnet Permits and DNR Shore Fishery Leases in Prince William Sound, Cook Inlet, Kodiak, Alaska Peninsula, and Bristol Bay 1975-2018*.

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 Chignik Salmon Purse Seine Fishery

S01L Permit Holdings

Limited entry permits for the Chignik salmon purse seine fishery (S01L permits) were issued starting in 1975. CFEC has issued 91 S01L permits. Table 1-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 35.2% (32/91) of the permits, Nonlocal Alaskans received 44.0% (40/91) of the permits, and Nonresidents received 20.9% (19/91). Every permit issued in this fishery was a transferable permit.

Table 1-1. Initial Issuance and Year-end 2024 Totals of Chignik Salmon Purse Seine Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

Residency	Initial Issue		Transfers		Migrations		Cancelled		2024 Year End	
	Total	Percentage	Change	Percent Change	Change	Percent Change	Change	Percent Change	Total	Percent
Local	32	35.2%	3	9.4%	-2	-6.3%	-1	-3.1%	32	36.0%
Nonlocal	40	44.0%	11	27.5%	-5	-12.5%	-1	-2.5%	45	50.6%
Nonresident	19	20.9%	-14	-73.7%	7	36.8%	0	0.0%	12	13.5%
Total	91		0		0		-2	-2.2%	89	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 S01L 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 Chignik Salmon Purse Seine Permits, 1980-2024

Acquisition Method	Chignik Salmon Purse Seine		Statewide Salmon Purse Seine		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent
Gift	81	36.3%	1,196	28.1%	14,341	33.0%
Sale	116	52.0%	2,667	62.7%	25,299	58.2%
Trade	1	0.4%	65	1.5%	541	1.2%
Other	25	11.2%	325	7.6%	3,294	7.6%
Total	223		4,253		43,475	

Table 1-2 compares transfer acquisition methods for the S01L permits, statewide salmon purse seine permits, and all limited entry permits between 1980 and 2024. Just under 40 percent of all S01L permit transfers were gifts (81/223), just over half of all transfers were sales (52%, or 116/223), only one transfer was a trade, and 25 permits were transferred as other (11.2%). The annual acquisition methods for S01L permits can be viewed in a different publication.³

Table 1-3. Relationships of Transferor to Transfer Recipients for Chignik Salmon Purse Seine Permits, 1980-2024

Relationship	Chignik Salmon Purse Seine		Statewide Salmon Purse Seine		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	24	10.8%	751	17.7%	8,189	18.8%
Member of Immediate Family	112	50.2%	1,367	32.1%	14,586	33.6%
Other Relative	7	3.1%	157	3.7%	1,938	4.5%
Other	80	35.9%	1,978	46.5%	18,762	43.2%
Total	223		4,253		43,475	

Table 1-3 shows the relationships between transferors and transfer recipients for S01L permits and compares S01L permit transfers with all statewide purse seine permits and all limited entry permits, from 1980 to 2024. Transfers within the family, both immediate family members and other relatives, total 53.4% (119/223) of all transfers. This compares to 35.8% (1,524/4,253) for all statewide salmon seine permit types combined, and 38.1% (16,524/43,475) for all limited entry permits statewide.

Emergency Transfers of S01L 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.

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. 22-2N.

Chignik Salmon Purse Seine (S01L)

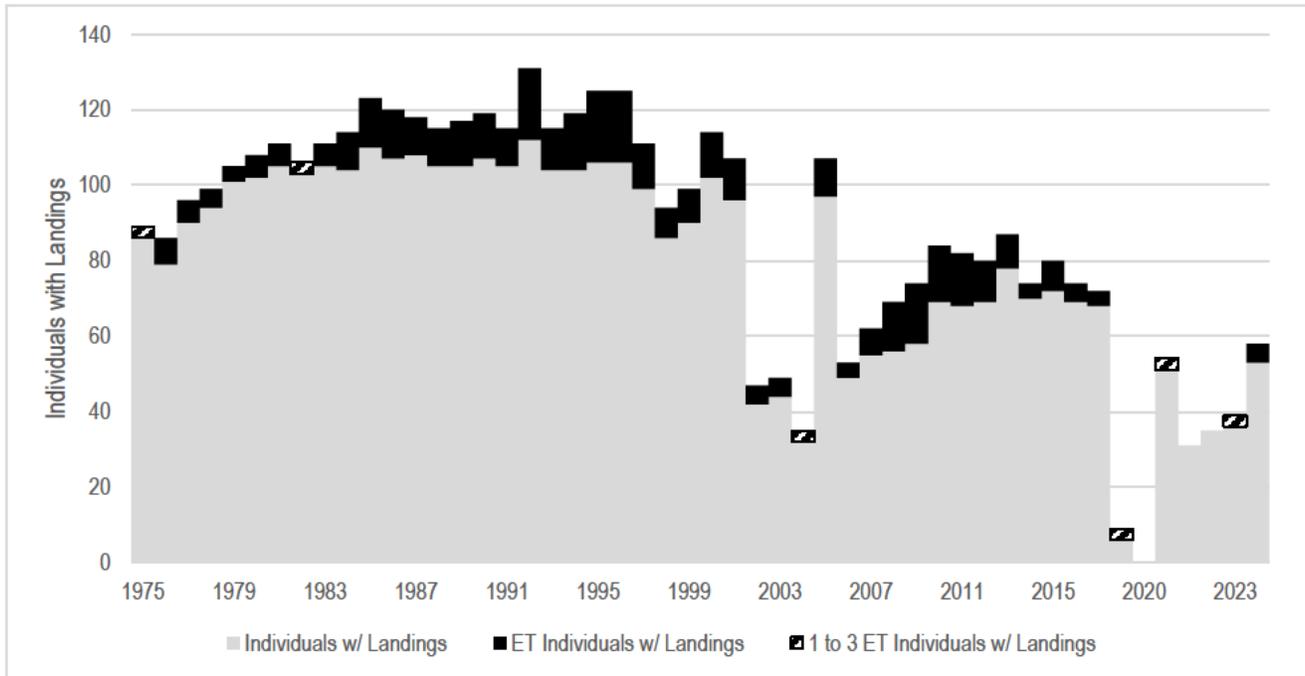
Table 1-4 and Figure 1-1 show the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. Some individuals who made landings with ET permits also made landings with permanent permits in the same year.

Table 1-4. Use of Emergency Transfer Permits in the Chignik Salmon Purse Seine Fishery, 1975-2024

Year	ET Permit			Year	ET Permit			Year	ET Permit		
	Individuals With Landings	Holders With Landings	ET Rate		Individuals With Landings	Holders With Landings	ET Rate		Individuals With Landings	Holders With Landings	ET Rate
1975	86	1 to 3	-	1992	112	19	17.0%	2009	58	16	27.6%
1976	79	7	8.9%	1993	104	11	10.6%	2010	69	15	21.7%
1977	90	6	6.7%	1994	104	15	14.4%	2011	68	14	20.6%
1978	94	5	5.3%	1995	106	19	17.9%	2012	69	11	15.9%
1979	101	4	4.0%	1996	106	19	17.9%	2013	78	9	11.5%
1980	102	6	5.9%	1997	99	12	12.1%	2014	70	4	5.7%
1981	105	6	5.7%	1998	86	8	9.3%	2015	72	8	11.1%
1982	103	1 to 3	-	1999	90	9	10.0%	2016	69	5	7.2%
1983	105	6	5.7%	2000	102	12	11.8%	2017	68	4	5.9%
1984	104	10	9.6%	2001	96	11	11.5%	2018	6	1 to 3	-
1985	110	13	11.8%	2002	42	5	11.9%	2019	51	1 to 3	-
1986	107	13	12.1%	2003	44	5	11.4%	2020	0	0	0.0%
1987	108	10	9.3%	2004	32	1 to 3	-	2021	31	0	0.0%
1988	105	10	9.5%	2005	97	10	10.3%	2022	35	0	0.0%
1989	105	12	11.4%	2006	49	4	8.2%	2023	36	1 to 3	-
1990	107	12	11.2%	2007	55	7	12.7%	2024	53	5	9.4%
1991	105	10	9.5%	2008	56	13	23.2%				

- When fewer than four individuals make landings, figures are masked due to confidentiality.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit during those years.

Figure 1-1. Use of Emergency Transfer Permits in the Chignik Salmon Purse Seine Fishery, 1975-2024



Latent S01L Permits

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

Table 1-5 indicates the total number of issued S01L permits issued each year, the number of permits fished (with commercial landings), and the rate of permit latency. Issued 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 rate of latency is depicted in Figure 1-2.

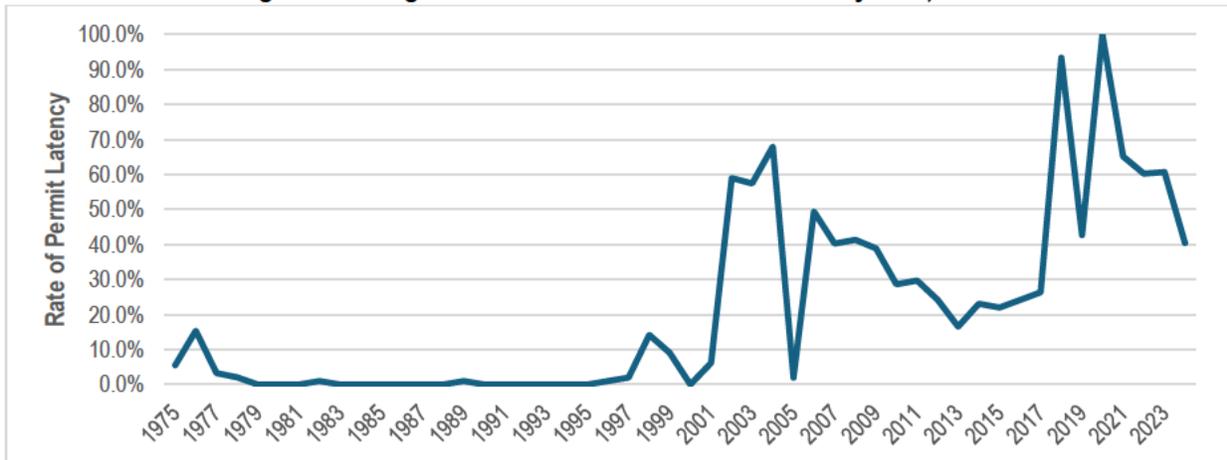
There are many reasons why an individual might not fish in any given year. This table and figure do not explain any of these reasons.

Table 1-5. Chignik Salmon Purse Seine Permit Latency, 1975-2024

Permits				Permits				Permits			
Year	Issued	Fished	Latency Rate	Year	Issued	Fished	Latency Rate	Year	Issued	Fished	Latency Rate
1975	91	86	5.5%	1992	101	101	0.0%	2009	90	55	38.9%
1976	91	77	15.4%	1993	102	102	0.0%	2010	91	65	28.6%
1977	91	88	3.3%	1994	99	99	0.0%	2011	91	64	29.7%
1978	95	93	2.1%	1995	100	100	0.0%	2012	91	69	24.2%
1979	101	101	0.0%	1996	101	100	1.0%	2013	91	76	16.5%
1980	101	101	0.0%	1997	100	98	2.0%	2014	91	70	23.1%
1981	102	102	0.0%	1998	99	85	14.1%	2015	91	71	22.0%
1982	102	101	1.0%	1999	99	90	9.1%	2016	91	69	24.2%
1983	100	100	0.0%	2000	99	99	0.0%	2017	91	67	26.4%
1984	100	100	0.0%	2001	98	92	6.1%	2018	90	6	93.3%
1985	101	101	0.0%	2002	100	41	59.0%	2019	89	51	42.7%
1986	100	100	0.0%	2003	101	43	57.4%	2020	89	0	100.0%
1987	102	102	0.0%	2004	100	32	68.0%	2021	89	31	65.2%
1988	101	101	0.0%	2005	99	97	2.0%	2022	88	35	60.2%
1989	101	100	1.0%	2006	95	48	49.5%	2023	89	35	60.7%
1990	101	101	0.0%	2007	92	55	40.2%	2024	89	53	40.4%
1991	101	101	0.0%	2008	92	54	41.3%				

- 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.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit during those years.

Figure 1-2. Chignik Salmon Purse Seine Permit Latency Rate, 1975-2024



Chignik Salmon Purse Seine (S01L)

New Entrants into the Chignik Salmon Purse Seine Fishery

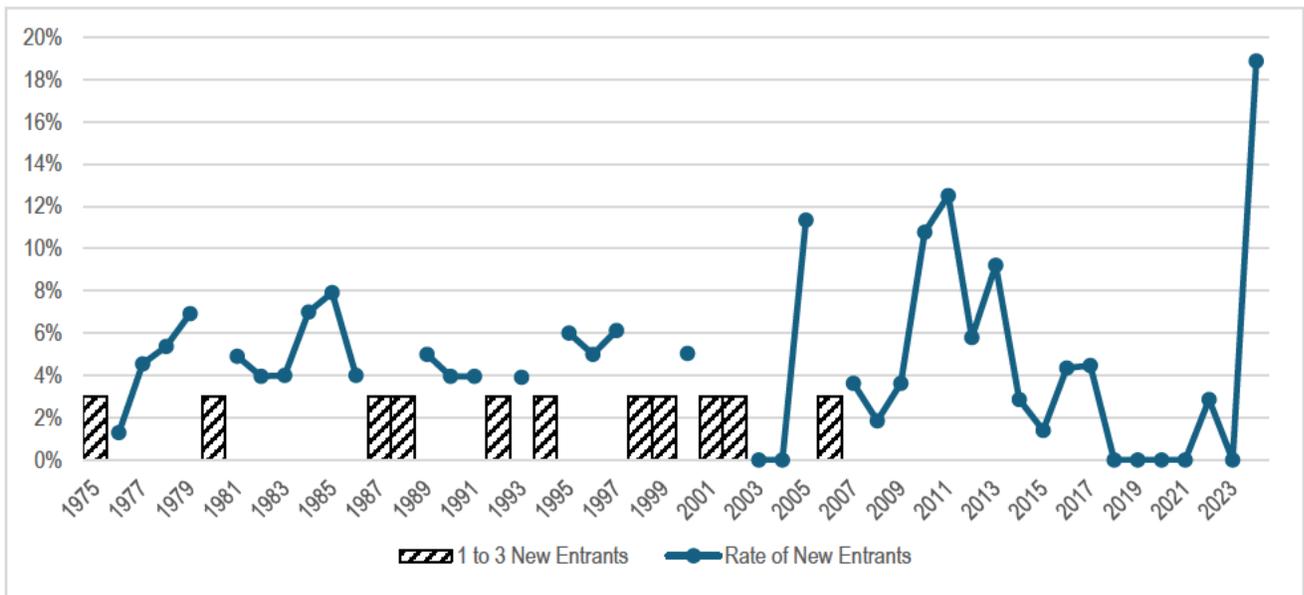
New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S01L permit and are displayed both in Table 1-6 and Figure 1-3. It is important to note that initial permit holders are not considered new entrants because they needed a proven fishing history prior 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 Chignik Salmon Purse Seine Fishery, 1975-2024

Individuals w/ New Entrants			Individuals w/ New Entrants			Individuals w/ New Entrants			Individuals w/ New Entrants		
Year	Landings	Count	Year	Landings	Count	Year	Landings	Count	Year	Landings	Count
1975	86	1 to 3	1988	101	1 to 3	2001	92	1 to 3	2014	70	2
1976	77	1	1989	100	5	2002	41	1 to 3	2015	71	1
1977	88	4	1990	101	4	2003	43	0	2016	69	3
1978	93	5	1991	101	4	2004	32	0	2017	67	3
1979	101	7	1992	101	1 to 3	2005	97	11	2018	6	0
1980	101	1 to 3	1993	102	4	2006	48	1 to 3	2019	51	0
1981	102	5	1994	99	1 to 3	2007	55	2	2020	0	0
1982	101	4	1995	100	6	2008	54	1	2021	31	0
1983	100	4	1996	100	5	2009	55	2	2022	35	1
1984	100	7	1997	98	6	2010	65	7	2023	35	0
1985	101	8	1998	85	1 to 3	2011	64	8	2024	53	10
1986	100	4	1999	90	1 to 3	2012	69	4			
1987	102	1 to 3	2000	99	5	2013	76	7			

- This table excludes individuals with interim-entry and emergency transfer permits.
- When fewer than four individuals make landings, figures are masked due to confidentiality.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit during those years.

Figure 1-3. New Entrants into the Chignik Salmon Purse Seine Fishery, 1975-2024



Age of S01L Permit Holders

Table 1-7. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	S01L	Statewide Salmon Purse Seine	Statewide All Permits	Median Alaskan Age
1980	45.1	41.0	39.4	26.0
1981	43.8	41.0	39.4	26.4
1982	44.3	40.7	39.3	26.8
1983	44.9	40.5	39.4	27.1
1984	43.0	40.9	39.7	27.3
1985	43.4	41.2	40.0	27.5
1986	42.2	40.9	40.0	27.8
1987	43.2	40.8	40.3	28.2
1988	43.5	40.8	40.5	28.6
1989	41.8	41.1	40.9	29.0
1990	41.9	41.6	41.3	29.3
1991	42.0	41.9	41.8	29.7
1992	43.0	42.6	42.3	30.1
1993	42.4	43.0	42.8	30.5
1994	42.8	43.4	43.3	30.8
1995	43.2	43.8	43.7	31.1
1996	41.9	44.5	44.3	31.5
1997	42.9	45.2	44.9	31.8
1998	45.3	46.0	45.3	32.1
1999	46.4	46.7	45.9	32.3
2000	46.5	47.1	46.3	32.4
2001	47.5	47.9	46.8	32.7
2002	47.8	48.6	47.5	33.0
2003	49.1	49.5	48.1	33.2
2004	50.1	50.5	48.6	33.4
2005	50.8	51.1	49.0	33.6
2006	51.8	51.7	49.4	33.8
2007	52.8	52.4	49.8	33.9
2008	53.7	52.4	50.2	33.9
2009	54.8	53.3	50.6	33.9
2010	54.7	53.5	51.0	33.8
2011	54.2	53.7	51.3	33.9
2012	55.1	53.8	51.7	33.9
2013	55.1	53.3	51.8	34.0
2014	53.9	53.3	52.2	34.2
2015	54.9	53.8	52.6	34.4
2016	56.2	54.5	53.1	34.6
2017	56.2	54.8	53.6	34.8
2018	57.9	55.1	53.9	35.1
2019	57.5	55.0	54.0	35.4
2020	57.8	55.3	54.3	35.6
2021	58.8	55.3	54.6	36.0
2022	59.0	55.1	54.7	36.4
2023	59.4	55.1	55.0	36.5
2024	56.0	55.3	55.3	36.9

- Median AK Working Age is the annual median age of all Alaskans age 16-64 as reported by the Alaska Department of Labor and Workforce Development, Research and Analysis Section.
- Age data from the CFEC permit file is as of December 31st of each year.

Table 1-7 shows the annual median age of four different cohorts of people: 1) Chignik salmon purse seine (S01L) permit holders; 2) all salmon purse seine permit holders statewide; 3) all CFEC limited entry permit holders; and 4) 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 S01L 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 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, and an increase of 14.3 years for statewide purse seine permit holders.

For S01L permit holders, the median age increased 10.9 years.

*Chignik Salmon Purse Seine (S01L)***S01L Permit Value**

Many permit transfers are non-monetary transactions (see Table 1-2). Table 1-8 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 1-8. CFEC Estimated Value of Chignik Salmon Purse Seine Permits

Year	S01L Permit Sales	Nominal Permit Value	Real Permit Value	Real Standard Deviation
1987	2	\$202,500	\$513,700	\$147,200
1988	2	\$174,600	\$469,800	\$39,100
1989	0	\$204,600	\$553,000	\$91,600
1990	2	\$220,100	\$546,600	\$83,500
1991	1	\$232,500	\$537,700	\$67,700
1992	5	\$183,200	\$405,200	\$25,300
1993	1	\$197,500	\$433,400	\$27,500
1994	3	\$193,400	\$398,700	\$49,800
1995	1	\$182,800	\$379,600	\$41,200
1996	2	\$166,000	\$331,400	\$25,600
1997	0	\$166,000	\$331,400	\$25,600
1998	0	\$166,000	\$331,400	\$25,600
1999	1	\$102,100	\$131,200	\$103,300
2000	3	\$53,800	\$98,300	\$12,000
2001	0	\$48,800	\$86,900	\$21,400
2002	1	\$34,500	\$54,500	\$34,500
2003	5	\$14,600	\$24,600	\$1,300
2004	3	\$17,200	\$28,300	\$4,100
2005	0	\$24,000	\$38,700	\$10,000
2006	2	\$31,000	\$49,500	\$10,500
2007	4	\$34,900	\$52,200	\$7,100
2008	14	\$53,900	\$77,700	\$14,400
2009	4	\$73,000	\$105,500	\$3,600
2010	6	\$60,000	\$85,400	\$4,200
2011	5	\$55,800	\$77,000	\$3,600
2012	5	\$65,500	\$88,500	\$8,100
2013	1	\$67,800	\$91,300	\$7,600
2014	2	\$65,900	\$86,700	\$8,200
2015	2	\$56,900	\$72,600	\$10,100
2016	4	\$57,400	\$74,200	\$7,000
2017	4	\$57,800	\$73,200	\$6,900
2018	4	\$97,500	\$120,500	\$34,700
2019	12	\$154,800	\$188,000	\$21,200
2020	2	\$164,200	\$198,200	\$26,900
2021	3	\$136,900	\$156,800	\$23,400
2022	4	\$166,200	\$176,300	\$4,400
2023	1	\$175,000	\$183,500	\$12,400
2024	1	\$175,000	\$176,900	\$16,200

- *Permit values represent averages of all arms-length sale transactions over the year.*
- *Real permit values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.*
- *From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit during those years.*

Chignik Salmon Purse Seine Vessel Characteristics

Table 1-9 reports on various vessel characteristics of the Chignik salmon purse seine 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 voluntary supplied information on vessels. The first column of each category is the count of vessel with the described characteristics; other statistics reported include the 25th percentile, median, and 75th percentile.

Table 1-9. Chignik Salmon Purse Seine Vessel Characteristics

Year	Vessel count	Age				Length(ft)				Horsepower				Refrigeration			Hold Capacity(ft ³)			
		Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	Count	%	Count	25%	Median	75%
1978	95	91	1	6	15	89	33	35	38	90	110	200	270	85	0	0.0%	32	300	400	500
1979	119	105	1	6	13	107	33	36	38	102	110	200	280	96	0	0.0%	34	350	400	600
1980	121	99	1	3	10	101	34	38	42	89	150	230	290	90	3	3.3%	36	400	500	965
1981	120	102	2	4	9	105	34	38	42	97	180	250	300	96	2	2.1%	34	360	500	700
1982	126	106	3	4	8	107	35	38	42	100	200	255	300	102	3	2.9%	38	300	520	700
1983	114	99	4	5	10	99	36	38	42	95	200	260	307	93	4	4.3%	37	400	600	925
1984	126	106	5	6	11	106	36	38	42	104	200	260	304	100	4	4.0%	45	400	600	800
1985	117	104	6	7	12	105	36	38	42	103	200	260	330	100	4	4.0%	42	500	695	980
1986	112	102	6	8	12	102	36	38	42	100	210	270	325	98	5	5.1%	39	400	650	925
1987	113	108	7	9	12	108	37	38	42	104	210	273	343	105	4	3.8%	43	400	700	800
1988	114	110	7	9	12	110	37	41	44	105	230	280	343	107	4	3.7%	46	500	700	800
1989	109	107	7	10	12	107	38	42	46	105	230	300	390	102	6	5.9%	44	520	710	1000
1990	112	103	7	11	13	103	38	42	46	101	238	307	450	98	5	5.1%	46	600	800	1000
1991	117	113	5	12	14	113	38	42	47	111	240	325	540	108	11	10.2%	50	400	760	1000
1992	108	103	6	13	15	103	38	42	47	101	260	340	550	98	11	11.2%	46	600	800	1000
1993	120	110	7	14	16	110	38	42	47	108	259	328	545	106	16	15.1%	54	432	800	1000
1994	121	108	7	14	16	108	38	42	47	105	270	340	585	100	19	19.0%	50	500	750	1000
1995	130	107	7	15	17	108	38	42	48	103	240	325	550	98	23	23.5%	50	500	800	1000
1996	116	105	8	16	18	105	38	44	48	100	250	347	550	94	24	25.5%	48	500	800	1000
1997	104	99	9	17	19	99	40	44	48	94	258	347	585	88	23	26.1%	45	500	800	1000
1998	98	90	13	19	21	90	38	42	47	85	250	320	550	80	17	21.3%	35	400	800	1000
1999	113	100	13	20	21	100	38	42	48	95	250	330	550	90	22	24.4%	44	355	800	1000
2000	112	103	12	20	22	103	40	46	50	98	270	350	585	92	27	29.3%	50	400	800	1000
2001	103	95	14	21	23	95	39	44	48	90	270	342	550	84	23	27.4%	44	450	806	1000
2002	56	47	16	22	24	47	38	42	47	46	275	347	550	44	9	20.5%	17	500	800	950
2003	60	47	18	24	25	47	38	44	47	44	255	333	525	41	6	14.6%	15	400	690	950
2004	49	35	18	24	26	35	38	42	47	34	240	328	550	34	6	17.6%	15	480	800	1000
2005	65	48	20	25	27	48	38	42	47	46	260	328	500	44	12	27.3%	23	448	800	1000
2006	72	58	20	27	28	58	38	45	48	55	260	365	650	54	15	27.8%	26	480	800	1000
2007	55	54	20	27	29	54	41	46	48	50	275	350	600	48	14	29.2%	20	440	800	1000
2008	56	54	23	28	30	54	38	44	48	51	240	340	550	50	17	34.0%	21	350	700	950
2009	60	57	24	30	32	57	38	44	47	53	230	330	500	53	17	32.1%	19	225	800	1000
2010	65	65	25	31	33	65	40	44	48	62	240	342	500	61	24	39.3%	27	400	800	1040
2011	70	70	26	32	34	70	38	44	48	66	240	342	485	67	30	44.8%	27	400	700	1000
2012	68	68	29	33	35	68	40	44	48	65	240	340	480	65	30	46.2%	28	450	710	1000
2013	77	77	28	34	36	77	40	44	48	74	270	355	480	74	42	56.8%	34	400	710	1040
2014	74	74	30	35	37	74	38	44	48	71	240	350	500	71	42	59.2%	33	500	700	1040
2015	71	71	29	35	37	71	40	46	54	68	273	365	575	68	43	63.2%	31	500	800	1090
2016	67	67	30	36	38	67	41	46	53	65	280	380	600	65	44	67.7%	31	500	812	1197
2017	66	66	31	38	39	66	40	46	50	63	280	370	600	63	40	63.5%	29	500	800	1000
2018	6	6	31	34	41	6	47	48	48	5	400	480	800	6	5	83.3%	2	925	15463	30000
2019	50	50	33	40	42	50	42	46	48	47	260	343	620	47	32	68.1%	22	500	875	1040
2021	32	32	31	38	44	32	42	47	55	31	300	400	850	31	25	80.6%	14	400	963	1040
2022	32	32	33	41	45	32	41	47	56	30	290	425	650	31	24	77.4%	15	400	1000	2400
2023	33	33	35	42	46	33	42	47	51	31	300	400	620	32	23	71.9%	14	500	963	1090
2024	50	50	34	41	47	50	42	48	56	48	330	425	750	49	40	81.6%	25	600	1000	1320
Total	692					424	32	38	47	405	165	280	410	387	118	30.5%	194	360	655	1000

- Total includes every unique vessel that participated in this fishery from 1978 to 2024.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01: permit benefited from the cooperative without using their permit during those years.

Chignik Salmon Purse Seine (S01L)

Table 1-10 provides additional Chignik salmon purse seine vessel characteristics. Included are statistics of engine propulsion and hull material for each year since 1978.

Table 1-10. Additional Chignik Salmon Purse Seine Vessel Characteristics

Year	Vessel count	Engine Power					Hull Material					
		Engine	Diesel	Gas	Hull	Aluminum	Fiberglass	Concrete	Steel	Rubber	Wood	
1978	95	91	90 98.9%	1 1.1%	92	2 2.2%	50 54.3%	0 0.0%	0 0.0%	0 0.0%	40 43.5%	
1979	119	105	102 97.1%	3 2.9%	108	2 1.9%	65 60.2%	0 0.0%	0 0.0%	0 0.0%	41 38.0%	
1980	121	102	98 96.1%	4 3.9%	102	2 2.0%	74 72.5%	0 0.0%	0 0.0%	0 0.0%	26 25.5%	
1981	120	103	97 94.2%	6 5.8%	105	6 5.7%	79 75.2%	0 0.0%	0 0.0%	0 0.0%	20 19.0%	
1982	126	108	100 92.6%	8 7.4%	107	4 3.7%	88 82.2%	0 0.0%	0 0.0%	0 0.0%	15 14.0%	
1983	114	99	98 99.0%	1 1.0%	99	2 2.0%	81 81.8%	0 0.0%	2 2.0%	0 0.0%	14 14.1%	
1984	126	106	102 96.2%	4 3.8%	106	2 1.9%	88 83.0%	0 0.0%	1 0.9%	0 0.0%	15 14.2%	
1985	117	104	96 92.3%	8 7.7%	105	4 3.8%	88 83.8%	0 0.0%	0 0.0%	0 0.0%	13 12.4%	
1986	112	100	95 95.0%	5 5.0%	102	2 2.0%	90 88.2%	0 0.0%	0 0.0%	0 0.0%	10 9.8%	
1987	113	107	102 95.3%	5 4.7%	108	5 4.6%	93 86.1%	0 0.0%	1 0.9%	0 0.0%	9 8.3%	
1988	114	108	105 97.2%	3 2.8%	110	4 3.6%	96 87.3%	0 0.0%	0 0.0%	0 0.0%	10 9.1%	
1989	109	106	102 96.2%	4 3.8%	107	2 1.9%	96 89.7%	0 0.0%	0 0.0%	0 0.0%	9 8.4%	
1990	112	103	101 98.1%	2 1.9%	103	2 1.9%	94 91.3%	0 0.0%	1 1.0%	0 0.0%	6 5.8%	
1991	117	113	108 95.6%	5 4.4%	113	1 0.9%	104 92.0%	0 0.0%	2 1.8%	0 0.0%	6 5.3%	
1992	108	103	102 99.0%	1 1.0%	103	1 1.0%	98 95.1%	0 0.0%	2 1.9%	0 0.0%	2 1.9%	
1993	120	110	107 97.3%	3 2.7%	110	2 1.8%	103 93.6%	0 0.0%	2 1.8%	0 0.0%	3 2.7%	
1994	121	107	105 98.1%	2 1.9%	108	5 4.6%	99 91.7%	0 0.0%	2 1.9%	0 0.0%	2 1.9%	
1995	130	105	98 93.3%	7 6.7%	107	3 2.8%	100 93.5%	0 0.0%	2 1.9%	0 0.0%	2 1.9%	
1996	116	101	98 97.0%	3 3.0%	105	4 3.8%	99 94.3%	0 0.0%	1 1.0%	0 0.0%	1 1.0%	
1997	104	95	95 100.0%	0 0.0%	99	1 1.0%	95 96.0%	0 0.0%	2 2.0%	0 0.0%	1 1.0%	
1998	98	86	84 97.7%	2 2.3%	90	2 2.2%	85 94.4%	0 0.0%	2 2.2%	0 0.0%	1 1.1%	
1999	113	96	91 94.8%	5 5.2%	100	8 8.0%	89 89.0%	0 0.0%	2 2.0%	0 0.0%	1 1.0%	
2000	112	99	98 99.0%	1 1.0%	103	4 3.9%	96 93.2%	0 0.0%	3 2.9%	0 0.0%	0 0.0%	
2001	103	91	90 98.9%	1 1.1%	95	1 1.1%	91 95.8%	0 0.0%	3 3.2%	0 0.0%	0 0.0%	
2002	56	46	44 95.7%	2 4.3%	47	3 6.4%	43 91.5%	0 0.0%	1 2.1%	0 0.0%	0 0.0%	
2003	60	45	44 97.8%	1 2.2%	47	2 4.3%	44 93.6%	0 0.0%	1 2.1%	0 0.0%	0 0.0%	
2004	49	35	34 97.1%	1 2.9%	35	1 2.9%	33 94.3%	0 0.0%	1 2.9%	0 0.0%	0 0.0%	
2005	65	47	46 97.9%	1 2.1%	48	2 4.2%	44 91.7%	0 0.0%	1 2.1%	0 0.0%	1 2.1%	
2006	72	56	55 98.2%	1 1.8%	58	1 1.7%	57 98.3%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	
2007	55	51	51 100.0%	0 0.0%	54	1 1.9%	53 98.1%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	
2008	56	52	50 96.2%	2 3.8%	54	1 1.9%	53 98.1%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	
2009	60	55	52 94.5%	3 5.5%	57	1 1.8%	55 96.5%	0 0.0%	1 1.8%	0 0.0%	0 0.0%	
2010	65	63	61 96.8%	2 3.2%	65	0 0.0%	64 98.5%	0 0.0%	1 1.5%	0 0.0%	0 0.0%	
2011	70	68	65 95.6%	3 4.4%	69	0 0.0%	65 94.2%	0 0.0%	3 4.3%	0 0.0%	1 1.4%	
2012	68	66	65 98.5%	1 1.5%	68	0 0.0%	65 95.6%	0 0.0%	2 2.9%	0 0.0%	1 1.5%	
2013	77	75	74 98.7%	1 1.3%	77	1 1.3%	72 93.5%	0 0.0%	3 3.9%	0 0.0%	1 1.3%	
2014	74	72	70 97.2%	2 2.8%	74	1 1.4%	68 91.9%	0 0.0%	4 5.4%	0 0.0%	1 1.4%	
2015	71	69	68 98.6%	1 1.4%	71	2 2.8%	64 90.1%	0 0.0%	5 7.0%	0 0.0%	0 0.0%	
2016	67	66	65 98.5%	1 1.5%	67	1 1.5%	61 91.0%	0 0.0%	5 7.5%	0 0.0%	0 0.0%	
2017	66	64	63 98.4%	1 1.6%	66	2 3.0%	61 92.4%	0 0.0%	3 4.5%	0 0.0%	0 0.0%	
2018	6	5	5 100.0%	0 0.0%	6	0 0.0%	6 100.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	
2019	50	48	47 97.9%	1 2.1%	50	1 2.0%	47 94.0%	0 0.0%	2 4.0%	0 0.0%	0 0.0%	
2021	32	31	30 96.8%	1 3.2%	32	3 9.4%	28 87.5%	0 0.0%	1 3.1%	0 0.0%	0 0.0%	
2022	32	31	30 96.8%	1 3.2%	32	1 3.1%	29 90.6%	0 0.0%	2 6.3%	0 0.0%	0 0.0%	
2023	33	32	31 96.9%	1 3.1%	33	1 3.0%	30 90.9%	0 0.0%	2 6.1%	0 0.0%	0 0.0%	
2024	50	49	48 98.0%	1 2.0%	50	3 6.0%	44 88.0%	0 0.0%	3 6.0%	0 0.0%	0 0.0%	
Total	692	415	336 81.0%	79 19.0%	424	51 12.0%	285 67.2%	0 0.0%	21 5.0%	0 0.0%	67 15.8%	

- Total includes every vessel in this fishery from 1978 to 2024.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004. Average Earnings will not properly reflect estimated earnings by permit holder or vessel for these years.

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 1-4 are for both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

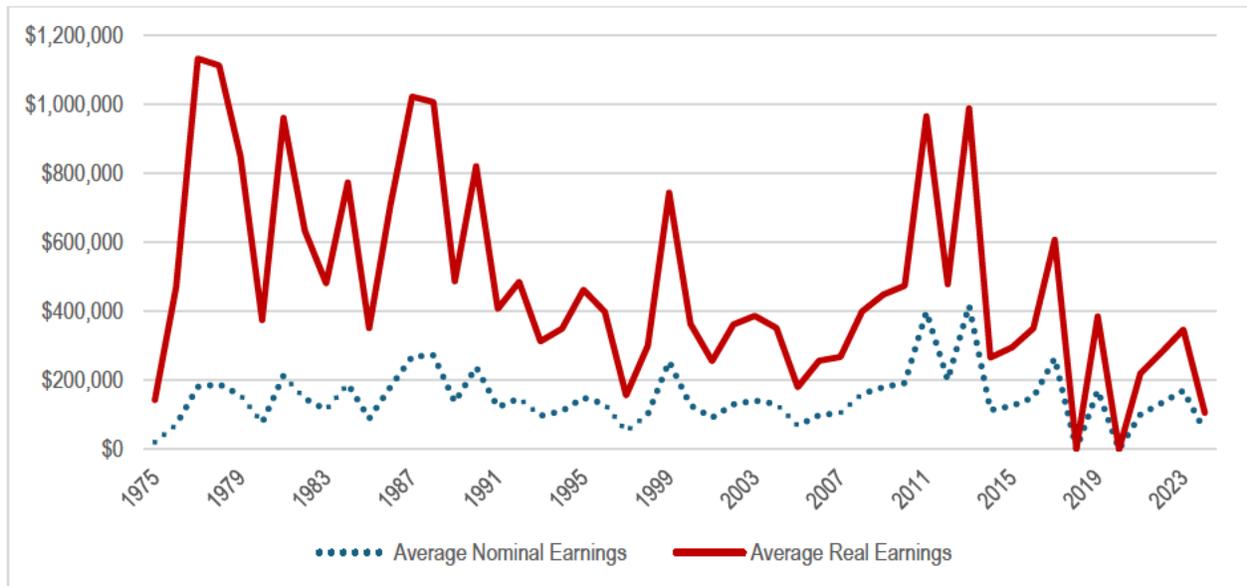
Permit counts include interim-entry permits and permanent permits. Interim-entry permits are issued to individuals during the period when their applications for permanent permits are in adjudication. The last year an interim-entry permit was held for the Chignik salmon purse seine fishery was in 2008. 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 1-11 reports the number of permits issued, permits with landings, and estimated gross earnings in the Chignik salmon purse seine 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 however many times the permit was transferred.

Table 1-12 reports the number of permit holders (people) and estimated real (inflation-adjusted) gross earnings by each resident type.

Figure 1-4 illustrates both average nominal and average real gross earnings by year for Chignik Salmon Purse Seine Permits, as well as the collapse in commercial fishing in Chignik in 2018 and 2020 with a near total closure in 2018 and complete closure in 2020. CFEC issued permit fee refunds to S01L permit holders in both years.

Figure 1-4. Estimated Nominal and Real Average Gross Earnings Per Chignik Salmon Purse Seine Permit



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

Chignik Salmon Purse Seine (S01L)

Table 1-11. Estimated Total Gross Earnings (Real and Nominal) for the Chignik Salmon Purse Seine Fishery, With Average Earnings (Real) by Permit, 1975-2024

Year	Permits Issued	Total Gross Earnings		Permits with Landings	Average Nominal Earnings	Average Real Earnings	Vessels with Landings	Average Real Vessel Earnings
		Nominal	Real					
1975	91	\$1,779,704	\$10,550,439	86	\$20,694	\$122,680	86	\$122,680
1976	91	\$5,486,251	\$30,748,242	77	\$71,250	\$399,328	78	\$394,208
1977	91	\$15,912,254	\$83,762,104	88	\$180,821	\$951,842	88	\$951,842
1978	95	\$17,562,986	\$85,897,053	93	\$188,849	\$923,624	95	\$904,180
1979	101	\$15,890,341	\$69,855,528	101	\$157,330	\$691,639	119	\$587,021
1980	101	\$7,778,332	\$30,127,035	101	\$77,013	\$298,287	121	\$248,984
1981	102	\$21,733,891	\$76,264,223	102	\$213,077	\$747,688	120	\$635,535
1982	102	\$14,867,916	\$49,144,408	101	\$147,207	\$486,578	126	\$390,035
1983	100	\$11,436,399	\$36,644,511	100	\$114,364	\$366,445	114	\$321,443
1984	100	\$18,989,185	\$58,298,696	100	\$189,892	\$582,987	126	\$462,688
1985	101	\$8,955,351	\$26,557,094	101	\$88,667	\$262,942	117	\$226,984
1986	100	\$18,139,377	\$52,765,634	100	\$181,394	\$527,656	112	\$471,122
1987	102	\$27,389,328	\$76,920,189	102	\$268,523	\$754,120	113	\$680,710
1988	101	\$27,492,891	\$74,170,320	101	\$272,207	\$734,360	114	\$650,617
1989	101	\$13,646,696	\$35,133,418	100	\$136,467	\$351,334	109	\$322,325
1990	101	\$24,062,162	\$58,762,205	101	\$238,239	\$581,804	112	\$524,663
1991	101	\$12,300,704	\$28,824,241	101	\$121,789	\$285,389	117	\$246,361
1992	101	\$14,988,314	\$34,086,423	101	\$148,399	\$337,489	108	\$315,615
1993	102	\$9,952,323	\$21,980,701	102	\$97,572	\$215,497	120	\$183,173
1994	99	\$10,980,605	\$23,637,948	99	\$110,915	\$238,767	121	\$195,355
1995	100	\$14,961,281	\$31,328,923	100	\$149,613	\$313,289	130	\$240,992
1996	101	\$13,150,294	\$26,750,327	100	\$131,503	\$267,503	116	\$230,606
1997	100	\$5,125,222	\$10,187,915	98	\$52,298	\$103,958	104	\$97,961
1998	99	\$8,617,756	\$16,869,258	85	\$101,385	\$198,462	98	\$172,135
1999	99	\$22,966,602	\$43,992,527	90	\$255,184	\$488,806	113	\$389,314
2000	99	\$12,629,695	\$23,404,087	99	\$127,573	\$236,405	112	\$208,965
2001	98	\$8,411,090	\$15,159,308	92	\$91,425	\$164,775	103	\$147,178
2002	100	\$5,348,911	\$9,488,969	41	\$130,461	\$231,438	56	\$169,446
2003	101	\$6,088,452	\$10,558,594	43	\$141,592	\$245,549	60	\$175,977
2004	100	\$4,191,186	\$7,079,333	32	\$130,975	\$221,229	49	\$144,476
2005	99	\$6,627,770	\$10,830,438	97	\$68,328	\$111,654	65	\$166,622
2006	95	\$4,764,730	\$7,543,043	48	\$99,265	\$157,147	72	\$104,764
2007	92	\$5,798,496	\$8,923,305	55	\$105,427	\$162,242	55	\$162,242
2008	92	\$8,702,917	\$12,901,204	54	\$161,165	\$238,911	56	\$230,379
2009	90	\$9,930,644	\$14,767,860	55	\$180,557	\$268,507	60	\$246,131
2010	91	\$12,509,651	\$18,304,122	65	\$192,456	\$281,602	65	\$281,602
2011	91	\$25,542,055	\$36,233,959	64	\$399,095	\$566,156	70	\$517,628
2012	91	\$13,842,993	\$19,238,992	69	\$200,623	\$278,826	68	\$282,926
2013	91	\$31,698,894	\$43,421,146	76	\$417,091	\$571,331	77	\$563,911
2014	91	\$7,935,605	\$10,697,195	70	\$113,366	\$152,817	74	\$144,557
2015	91	\$8,955,851	\$12,057,262	71	\$126,139	\$169,821	71	\$169,821
2016	91	\$10,403,040	\$13,830,842	69	\$150,769	\$200,447	67	\$206,430
2017	91	\$17,685,960	\$23,021,814	67	\$263,970	\$343,609	66	\$348,815
2018	90	\$3,495	\$4,442	6	\$583	\$740	6	\$740
2019	89	\$8,727,704	\$10,893,048	51	\$171,131	\$213,589	50	\$217,861
2020	89	-	-	0	-	-	0	-
2021	89	\$3,132,523	\$3,688,859	31	\$101,049	\$118,995	32	\$115,277
2022	88	\$4,732,711	\$5,160,548	35	\$135,220	\$147,444	32	\$161,267
2023	89	\$5,939,562	\$6,219,909	35	\$169,702	\$177,712	33	\$188,482
2024	89	\$2,805,202	\$2,853,452	53	\$52,928	\$53,839	50	\$57,069

- 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.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefitted from the cooperative without using their permit from 2002 – 2004. Average earnings will not properly reflect estimated earnings by permit holder or vessel for those years.

Chignik Salmon Purse Seine (S01L)

Table 1-12. Estimated Real Gross Earnings for Permit Holders in the Chignik Salmon Purse Seine Fishery by Resident Type, 1975-2024

Year	Local			Nonlocal			Nonresident			Total		
	People	Average	Total	People	Average	Total	People	Average	Total	People	Average	Total
1975	27	\$139,611	\$3,769,486	39	\$111,840	\$4,361,741	20	\$120,961	\$2,419,212	86	\$122,680	\$10,550,439
1976	30	\$372,098	\$11,162,942	34	\$412,935	\$14,039,780	15	\$369,701	\$5,545,521	79	\$389,218	\$30,748,242
1977	31	\$925,490	\$28,690,190	41	\$967,349	\$39,661,296	18	\$856,145	\$15,410,617	90	\$930,690	\$83,762,104
1978	37	\$836,933	\$30,966,522	44	\$977,619	\$43,015,221	13	\$916,562	\$11,915,310	94	\$913,798	\$85,897,053
1979	39	\$581,267	\$22,669,394	48	\$765,993	\$36,767,648	14	\$744,178	\$10,418,486	101	\$691,639	\$69,855,528
1980	43	\$259,786	\$11,170,811	45	\$329,960	\$14,848,204	14	\$293,430	\$4,108,020	102	\$295,363	\$30,127,035
1981	42	\$612,927	\$25,742,935	46	\$858,129	\$39,473,951	17	\$649,843	\$11,047,337	105	\$726,326	\$76,264,223
1982	47	\$463,840	\$21,800,480	40	\$520,595	\$20,823,819	16	\$407,507	\$6,520,109	103	\$477,130	\$49,144,408
1983	49	\$324,440	\$15,897,566	40	\$390,354	\$15,614,157	16	\$320,799	\$5,132,788	105	\$348,995	\$36,644,511
1984	51	\$495,702	\$25,280,783	37	\$624,777	\$23,116,746	16	\$618,823	\$9,901,167	104	\$560,564	\$58,298,696
1985	54	\$271,742	\$14,674,071	40	\$225,250	\$9,010,007	16	\$179,564	\$2,873,017	110	\$241,428	\$26,557,094
1986	56	\$481,683	\$26,974,260	35	\$541,207	\$18,942,259	16	\$428,070	\$6,849,116	107	\$493,137	\$52,765,634
1987	57	\$693,784	\$39,545,709	37	\$726,055	\$26,864,044	14	\$750,745	\$10,510,436	108	\$712,224	\$76,920,189
1988	54	\$634,336	\$34,254,124	35	\$772,884	\$27,050,932	16	\$804,079	\$12,865,264	105	\$706,384	\$74,170,320
1989	53	\$396,334	\$21,005,692	36	\$318,328	\$11,459,793	16	\$166,746	\$2,667,934	105	\$334,604	\$35,133,418
1990	48	\$538,664	\$25,855,890	42	\$558,206	\$23,444,636	17	\$556,569	\$9,461,679	107	\$549,179	\$58,762,205
1991	47	\$271,711	\$12,770,429	38	\$252,070	\$9,578,660	20	\$323,758	\$6,475,151	105	\$274,517	\$28,824,241
1992	54	\$282,058	\$15,231,151	40	\$291,903	\$11,676,110	18	\$398,842	\$7,179,163	112	\$304,343	\$34,086,423
1993	47	\$193,994	\$9,117,696	38	\$196,829	\$7,479,517	19	\$283,341	\$5,383,487	104	\$211,353	\$21,980,701
1994	54	\$206,294	\$11,139,876	33	\$219,258	\$7,235,521	17	\$309,562	\$5,262,550	104	\$227,288	\$23,637,948
1995	46	\$303,639	\$13,967,401	37	\$285,541	\$10,565,024	23	\$295,500	\$6,796,498	106	\$295,556	\$31,328,923
1996	50	\$229,955	\$11,497,736	35	\$259,759	\$9,091,550	21	\$293,383	\$6,161,041	106	\$252,362	\$26,750,327
1997	48	\$89,519	\$4,296,904	35	\$111,386	\$3,898,507	16	\$124,532	\$1,992,504	99	\$102,908	\$10,187,915
1998	50	\$176,279	\$8,813,963	24	\$201,395	\$4,833,490	12	\$268,484	\$3,221,805	86	\$196,154	\$16,869,258
1999	46	\$483,615	\$22,246,311	32	\$473,716	\$15,158,905	12	\$548,943	\$6,587,311	90	\$488,806	\$43,992,527
2000	49	\$229,685	\$11,254,556	38	\$224,027	\$8,513,017	15	\$242,434	\$3,636,514	102	\$229,452	\$23,404,087
2001	48	\$157,804	\$7,574,570	33	\$146,042	\$4,819,389	15	\$184,357	\$2,765,349	96	\$157,909	\$15,159,308
2002	29	\$186,732	\$5,415,234	Confidential	Confidential	Confidential	1 to 3	Confidential	Confidential	42	\$225,928	\$9,488,969
2003	30	\$205,595	\$6,167,848	9	\$375,060	\$3,375,543	5	\$203,041	\$1,015,204	44	\$239,968	\$10,558,594
2004	24	\$187,554	\$4,501,305	Confidential	Confidential	Confidential	1 to 3	Confidential	Confidential	32	\$221,229	\$7,079,333
2005	42	\$140,474	\$5,899,915	37	\$90,890	\$3,362,948	18	\$87,087	\$1,567,575	97	\$111,654	\$10,830,438
2006	29	\$165,086	\$4,787,487	15	\$131,603	\$1,974,038	5	\$156,304	\$781,518	49	\$153,940	\$7,543,043
2007	30	\$179,862	\$5,395,860	15	\$126,936	\$1,904,033	10	\$162,341	\$1,623,412	55	\$162,242	\$8,923,305
2008	36	\$218,811	\$7,877,183	14	\$200,976	\$2,813,659	6	\$368,394	\$2,210,363	56	\$230,379	\$12,901,204
2009	38	\$253,089	\$9,617,399	12	\$249,376	\$2,992,514	8	\$269,743	\$2,157,947	58	\$254,618	\$14,767,860
2010	34	\$244,678	\$8,319,051	27	\$258,427	\$6,977,540	8	\$375,941	\$3,007,531	69	\$265,277	\$18,304,122
2011	38	\$542,506	\$20,615,243	22	\$466,525	\$10,263,555	8	\$669,395	\$5,355,161	68	\$532,852	\$36,233,959
2012	37	\$275,923	\$10,209,164	23	\$288,451	\$6,634,368	9	\$266,162	\$2,395,460	69	\$278,826	\$19,238,992
2013	37	\$573,883	\$21,233,661	31	\$555,617	\$17,224,136	10	\$496,335	\$4,963,349	78	\$556,681	\$43,421,146
2014	34	\$152,605	\$5,188,563	27	\$126,655	\$3,419,682	9	\$232,106	\$2,088,950	70	\$152,817	\$10,697,195
2015	34	\$164,042	\$5,577,413	30	\$157,854	\$4,735,607	8	\$218,030	\$1,744,243	72	\$167,462	\$12,057,262
2016	34	\$199,969	\$6,798,962	26	\$207,259	\$5,388,729	9	\$182,572	\$1,643,151	69	\$200,447	\$13,830,842
2017	36	\$326,545	\$11,755,624	24	\$351,645	\$8,439,484	8	\$353,338	\$2,826,706	68	\$338,556	\$23,021,814
2018	4	\$1,027	\$4,110	Confidential	Confidential	Confidential	1 to 3	Confidential	\$145	6	\$740	\$4,442
2019	27	\$206,811	\$5,583,906	18	\$231,520	\$4,167,351	6	\$190,298	\$1,141,790	51	\$213,589	\$10,893,048
2020	0	\$0	\$0	0	\$0	\$0	0	\$0	\$0	0	\$0	\$0
2021	17	\$141,971	\$2,413,499	Confidential	Confidential	Confidential	1 to 3	Confidential	Confidential	31	\$118,995	\$3,688,859
2022	16	\$165,048	\$2,640,772	14	\$123,736	\$1,732,303	5	\$157,495	\$787,473	35	\$147,444	\$5,160,548
2023	19	\$181,830	\$3,454,764	12	\$159,899	\$1,918,789	5	\$169,271	\$846,357	36	\$172,775	\$6,219,909
2024	22	\$55,557	\$1,222,254	27	\$56,346	\$1,521,347	4	\$27,463	\$109,851	53	\$53,839	\$2,853,452

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- When fewer than four individuals in a cohort make landings, counts of participation and earnings are masked for both that cohort and at least one other cohort that year.
- 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.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permits from 2002 – 2004. Average earnings will not properly reflect estimated earnings by permit holder or vessel for those years.

Chapter 2 Alaska Peninsula Purse Seine Fishery

S01M Permit Holdings

Limited entry permits for the Alaska Peninsula (referred to also as Area M) salmon purse seine fishery (S01M) were issued starting in 1975. CFEC has issued 121 S01M permits. Table 2-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 84.3% (102/121) of the permits, Nonlocal Alaskans received 2.5% (3/121) of the permits, and Nonresidents received 13.2% (16/121). Every permit issued in this fishery was a transferable permit.

Table 2-1. Initial Issuance and Year-end 2024 Totals of Alaska Peninsula Salmon Purse Seine Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

Residency	Initial Issue		Transfers		Migrations		Cancelled		2024 Year End	
	Count	Percent	Count	Percent Change	Count	Percent Change	Count	Percent Change	Count	Percent
Local	102	84.3%	-34	-33.3%	-16	-15.7%	-1	-1.0%	51	43.2%
Nonlocal	3	2.5%	11	366.7%	16	533.3%	0	0.0%	30	25.4%
Nonresident	16	13.2%	23	143.8%	0	0.0%	-2	-12.5%	37	31.4%
Total	121		0		0		-3	-2.5%	118	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 S01M 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 Alaska Peninsula Salmon Purse Seine Permits, 1980-2024

Acquisition Method	Alaska Peninsula Salmon Purse Seine		Combined Alaska Peninsula		Statewide Salmon Purse Seine		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	140	38.1%	544	37.5%	1,196	28.1%	14,341	33.0%
Sale	181	49.3%	758	52.3%	2,667	62.7%	25,299	58.2%
Trade	10	2.7%	32	2.2%	65	1.5%	541	1.2%
Other	36	9.8%	115	7.9%	325	7.6%	3,294	7.6%
Total	367		1,449		4,253		43,475	

Table 2-2 compares the transfer acquisition methods for the S01M permits, the combined Alaska Peninsula salmon permit types, all statewide salmon purse seine permits, and all limited entry permits between 1980 and 2024. The majority of all S01M transfers were sales (49.3% or 181/367), followed by gifts (38.1% or 140/367), and a smaller percentage were trades (2.7% or 10/367) or other (9.8% or 36/367). The annual acquisition methods for S01M permits can be viewed in a different publication.⁵

⁴ CFEC implemented the transfer survey in 1980.

⁵ See *Changes in the Distribution of Alaska’s Commercial Fisheries Entry Permits, 1975-2021*, CFEC Report No. 22-2N.

Alaska Peninsula Salmon Purse Seine (S01M)

Table 2-3. Relationships of Transferor to Transfer Recipients for Alaska Peninsula Salmon Purse Seine Permits, 1980-2024

Relationship	Alaska Peninsula Salmon Purse Seine		Combined Alaska Peninsula		Statewide Salmon Purse Seine		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	58	15.8%	258	17.8%	751	17.7%	8,189	18.8%
Member of Immediate Family	171	46.6%	571	39.4%	1,367	32.1%	14,586	33.6%
Other Relative	10	2.7%	78	5.4%	157	3.7%	1,938	4.5%
Other	128	34.9%	542	37.4%	1,978	46.5%	18,762	43.2%
Total	367		1,449		4,253		43,475	

Table 2-3 shows the relationships between the transferors and transfer recipients for S01M permits and compares S01M permit transfers with all Alaska Peninsula salmon permit types, all statewide salmon seine permits, and all limited entry permits from 1980 to 2024. Transfers within the family, both between immediate family members and other relatives, total 49.3% (181/367) of all permit transfers for S01M permits compared to 44.8% (649/1,449) combined Area M salmon permit types, 35.8% (1,524/4,253) for all salmon seine permits statewide, and 38.0% (16,524/43,475) for all limited entry permits statewide.

Emergency Transfers of S01M 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 and Figure 2-1 show 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.

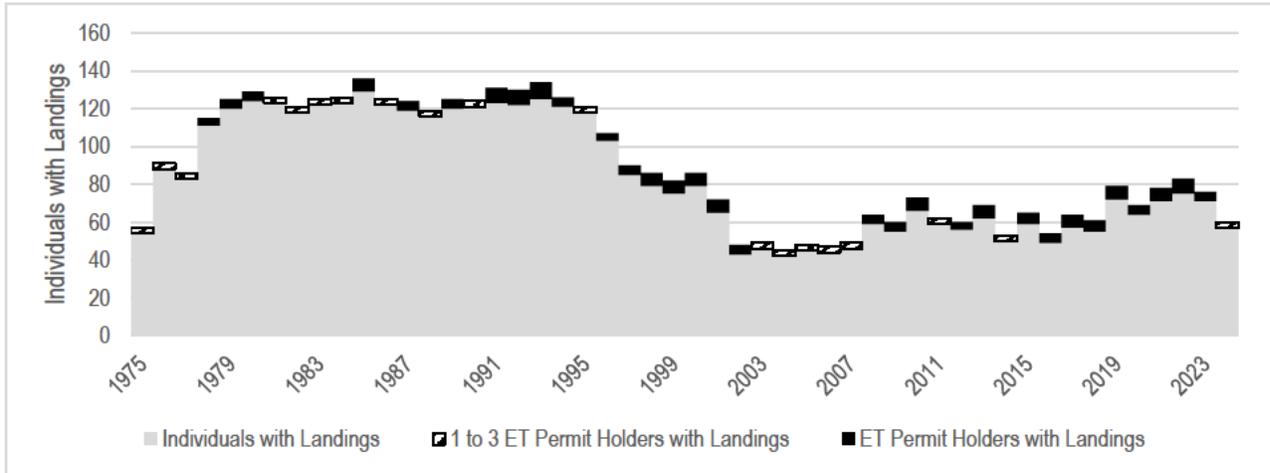
Table 2-4. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Purse Seine Fishery, 1975-2024

Year	Individuals With Landings	ET Permit Holders w/ Landings	ET Rate	Year	Individuals With Landings	ET Permit Holders w/ Landings	ET Rate	Year	Individuals With Landings	ET Permit Holders w/ Landings	ET Rate
1975	54	1 to 3	-	1992	122	8	6.6%	2009	55	5	9.1%
1976	88	1 to 3	-	1993	125	9	7.2%	2010	66	7	10.6%
1977	83	1 to 3	-	1994	121	5	4.1%	2011	59	1 to 3	-
1978	111	4	3.6%	1995	118	1 to 3	-	2012	56	4	7.1%
1979	120	5	4.2%	1996	103	4	3.9%	2013	62	7	11.3%
1980	124	5	4.0%	1997	85	5	5.9%	2014	50	1 to 3	-
1981	123	1 to 3	-	1998	79	7	8.9%	2015	59	6	10.2%
1982	118	1 to 3	-	1999	75	7	9.3%	2016	49	5	10.2%
1983	122	1 to 3	-	2000	79	7	8.9%	2017	57	7	12.3%
1984	123	1 to 3	-	2001	65	7	10.8%	2018	55	6	10.9%
1985	129	7	5.4%	2002	43	5	11.6%	2019	72	7	9.7%
1986	122	1 to 3	-	2003	46	1 to 3	-	2020	64	5	7.8%
1987	119	5	4.2%	2004	42	1 to 3	-	2021	71	7	9.9%
1988	116	1 to 3	-	2005	45	1 to 3	-	2022	75	8	10.7%
1989	120	5	4.2%	2006	44	1 to 3	-	2023	71	5	7.0%
1990	121	1 to 3	-	2007	46	1 to 3	-	2024	57	1 to 3	-
1991	123	8	6.5%	2008	59	5	8.5%				

• When fewer than four individuals make landings, figures are masked due to confidentiality.

Alaska Peninsula Salmon Purse Seine (S01M)

Figure 2-1. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Purse Seine Fishery, 1975-2024



Latent S01M Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they actually fish. Permits that are not used (do not record landings) in a given year are referred to herein as “latent” permits for that year.

Table 2-5 indicates the total number of issued S01M permits issued each year, the number of permits fished (with commercial landings), and the rate of permit latency. Issued 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 rate of latency is depicted in Figure 2-2.

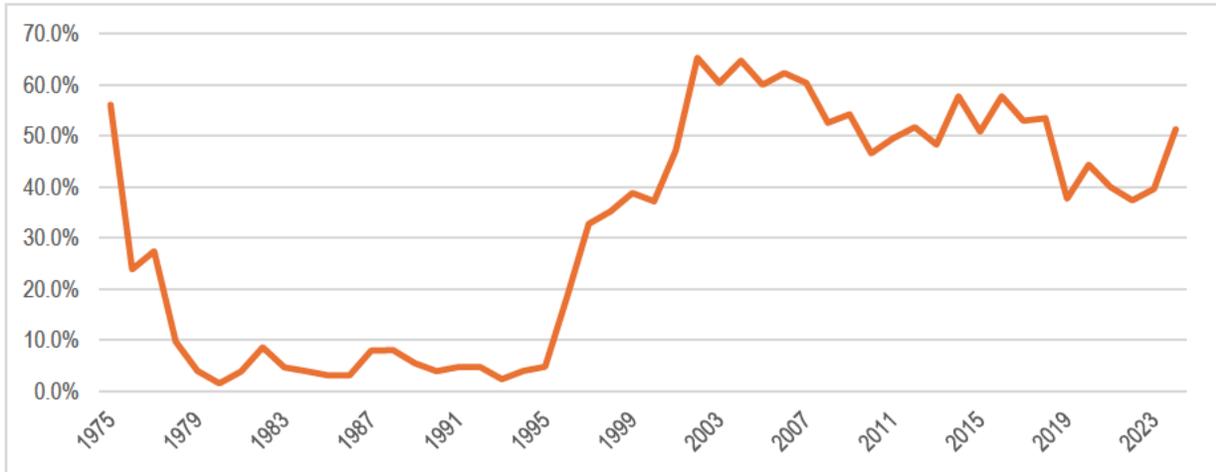
There are many reasons why an individual might not fish in any given year. This table and figure do not explain any of these reasons.

Table 2-5. Alaska Peninsula Salmon Purse Seine Permit Latency, 1975-2024

Permits				Permits				Permits			
Year	Issued	Fished	Latency Rate	Year	Issued	Fished	Latency Rate	Year	Issued	Fished	Latency Rate
1975	123	54	56.1%	1992	125	119	4.8%	2009	118	54	54.2%
1976	113	86	23.9%	1993	125	122	2.4%	2010	118	63	46.6%
1977	113	82	27.4%	1994	124	119	4.0%	2011	117	59	49.6%
1978	123	111	9.8%	1995	124	118	4.8%	2012	116	56	51.7%
1979	123	118	4.1%	1996	124	101	18.5%	2013	116	60	48.3%
1980	125	123	1.6%	1997	122	82	32.8%	2014	116	49	57.8%
1981	127	122	3.9%	1998	122	79	35.2%	2015	116	57	50.9%
1982	127	116	8.7%	1999	121	74	38.8%	2016	116	49	57.8%
1983	127	121	4.7%	2000	121	76	37.2%	2017	117	55	53.0%
1984	126	121	4.0%	2001	121	64	47.1%	2018	116	54	53.4%
1985	127	123	3.1%	2002	121	42	65.3%	2019	114	71	37.7%
1986	125	121	3.2%	2003	116	46	60.3%	2020	115	64	44.3%
1987	125	115	8.0%	2004	119	42	64.7%	2021	115	69	40.0%
1988	124	114	8.1%	2005	115	46	60.0%	2022	115	72	37.4%
1989	126	119	5.6%	2006	114	43	62.3%	2023	116	70	39.7%
1990	126	121	4.0%	2007	116	46	60.3%	2024	115	56	51.3%
1991	126	120	4.8%	2008	116	55	52.6%				

- 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 2-2. Alaska Peninsula Salmon Purse Seine Permit Latency Rate, 1975-2024



New Entrants into the Alaska Peninsula Salmon Purse Seine Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S01M 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 2-6 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 S01M permit one year, and then in subsequent years hold a different S01M 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.

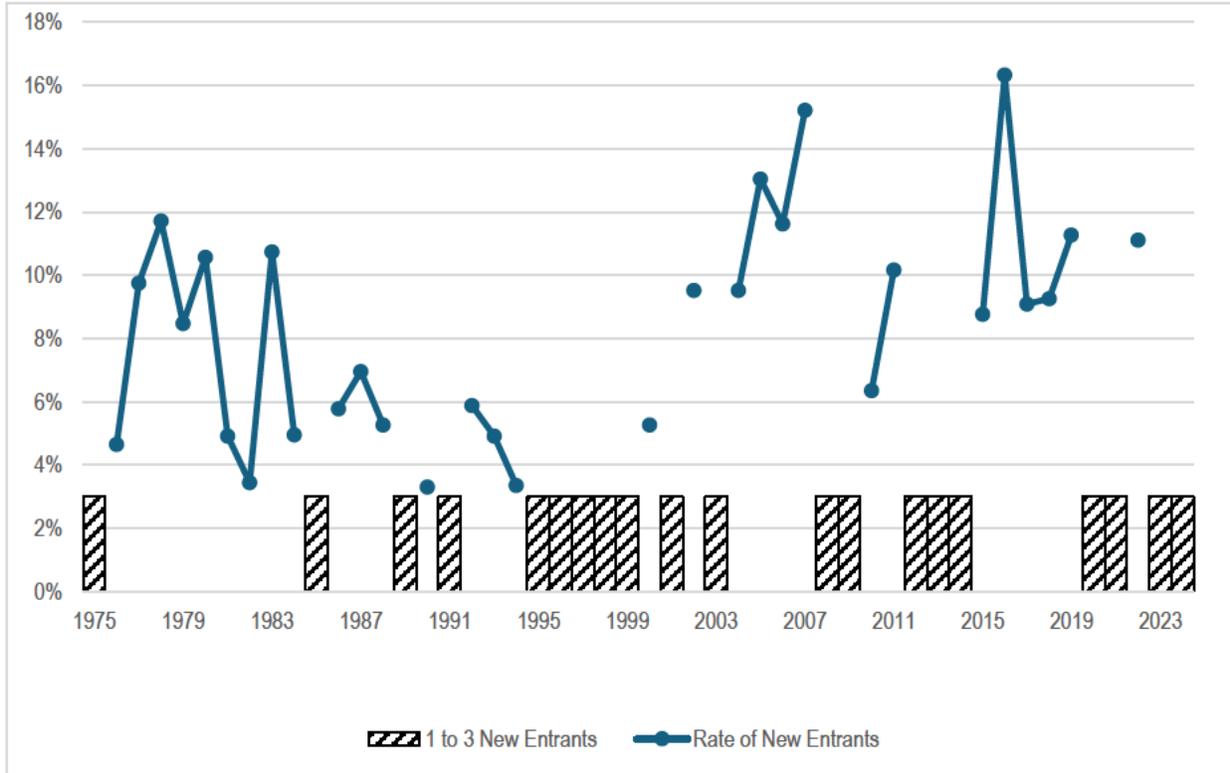
Table 2-6. New Entrants into the Alaskan Peninsula Salmon Purse Seine Fishery, 1975-2024

Individuals New Entrants w/															
Year	Landings	Count	Percent												
1975	54	1 to 3	-	1988	114	6	5.3%	2001	64	1 to 3	-	2014	49	1 to 3	-
1976	86	4	4.7%	1989	119	1 to 3	-	2002	42	4	9.5%	2015	57	5	8.8%
1977	82	8	9.8%	1990	121	4	3.3%	2003	46	1 to 3	-	2016	49	8	16.3%
1978	111	13	11.7%	1991	120	1 to 3	-	2004	42	4	9.5%	2017	55	5	9.1%
1979	118	10	8.5%	1992	119	7	5.9%	2005	46	6	13.0%	2018	54	5	9.3%
1980	123	13	10.6%	1993	122	6	4.9%	2006	43	5	11.6%	2019	71	8	11.3%
1981	122	6	4.9%	1994	119	4	3.4%	2007	46	7	15.2%	2020	64	1 to 3	-
1982	116	4	3.4%	1995	118	1 to 3	-	2008	55	1 to 3	-	2021	69	1 to 3	-
1983	121	13	10.7%	1996	101	1 to 3	-	2009	54	1 to 3	-	2022	72	8	11.1%
1984	121	6	5.0%	1997	82	1 to 3	-	2010	63	4	6.3%	2023	70	1 to 3	-
1985	123	1 to 3	-	1998	79	1 to 3	-	2011	59	6	10.2%	2024	56	1 to 3	-
1986	121	7	5.8%	1999	74	1 to 3	-	2012	56	1 to 3	-				
1987	115	8	7.0%	2000	76	4	5.3%	2013	60	1 to 3	-				

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

Alaska Peninsula Salmon Purse Seine (S01M)

Figure 2-3. New Entrants into the Alaska Peninsula Salmon Purse Seine Fishery, 1975-2024



Age of S01M Permit Holders

Table 2-7. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	Combined AK		Statewide		Median AK Age
	S01M	Peninsula	Salmon Purse Seine	Statewide All Permits	
1980	39.1	38.0	41.0	39.4	26.0
1981	39.1	37.3	41.0	39.4	26.4
1982	40.1	37.3	40.7	39.3	26.8
1983	38.6	36.1	40.5	39.4	27.1
1984	39.3	36.4	40.9	39.7	27.3
1985	41.1	36.8	41.2	40.0	27.5
1986	40.9	37.5	40.9	40.0	27.8
1987	42.6	38.0	40.8	40.3	28.2
1988	43.4	37.8	40.8	40.5	28.6
1989	43.9	38.3	41.1	40.9	29.0
1990	44.3	38.8	41.6	41.3	29.3
1991	45.3	39.1	41.9	41.8	29.7
1992	45.1	39.6	42.6	42.3	30.1
1993	46.4	41.0	43.0	42.8	30.5
1994	47.1	41.8	43.4	43.3	30.8
1995	48.0	42.5	43.8	43.7	31.1
1996	48.3	43.0	44.5	44.3	31.5
1997	49.3	43.8	45.2	44.9	31.8
1998	49.6	44.6	46.0	45.3	32.1
1999	50.8	45.5	46.7	45.9	32.3
2000	50.6	45.9	47.1	46.3	32.4
2001	51.0	46.7	47.9	46.8	32.7
2002	50.8	47.5	48.6	47.5	33.0
2003	51.0	48.5	49.5	48.1	33.2
2004	51.7	49.0	50.5	48.6	33.4
2005	52.7	48.3	51.1	49.0	33.6
2006	53.8	48.6	51.7	49.4	33.8
2007	54.5	49.3	52.4	49.8	33.9
2008	53.5	49.8	52.4	50.2	33.9
2009	54.5	50.6	53.3	50.6	33.9
2010	55.0	50.6	53.5	51.0	33.8
2011	55.9	51.3	53.7	51.3	33.9
2012	55.8	52.1	53.8	51.7	33.9
2013	56.1	52.3	53.3	51.8	34.0
2014	56.3	52.1	53.3	52.2	34.2
2015	57.1	53.1	53.8	52.6	34.4
2016	57.8	53.4	54.5	53.1	34.6
2017	59.1	54.2	54.8	53.6	34.8
2018	58.0	54.0	55.1	53.9	35.1
2019	57.3	54.2	55.0	54.0	35.4
2020	58.2	54.7	55.3	54.3	35.6
2021	59.2	55.3	55.3	54.6	36.0
2022	59.3	54.3	55.1	54.7	36.4
2023	60.3	54.7	55.1	55.0	36.5
2024	60.7	55.1	55.3	55.3	36.9

- Mean AK Working Age is the annual average age of all Alaskans age 16-64 as reported by the Alaska Department of Labor and Workforce Development, Research and Analysis Section.
- Age data from the CFEC permit file is as of December 31st of each year.

Table 2-7 shows the annual median age of five different cohorts of people: 1) Alaska Peninsula salmon purse seine (S01M) permit holders; 2) combined Alaska Peninsula salmon permit holders; 3) all statewide salmon purse seine permit holders; 4) all CFEC limited entry permit holders; and 5) the Alaskan general population.

Note that these figures include ages of permit holders for both transferable and nontransferable 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 15.9 years, and 14.3 years for the statewide salmon purse seine permit holders, and 17.1 years for the combined Alaska Peninsula salmon permit holders.

For S01M permit holders, the median age increased 21.6 years.

*Alaska Peninsula Salmon Purse Seine (S01M)***S01M Permit Value**

Many permit transfers are non-monetary transactions (see Table 2-2). Table 2-8 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 2-8. CFEC Estimated Value of Alaska Peninsula Salmon Purse Seine Permits

Year	S01M Permit Sales	Nominal Permit Value	Real Permit Value	Real Standard Deviation
1987	2	\$202,500	\$513,700	\$147,200
1988	2	\$174,600	\$469,800	\$39,100
1989	0	\$204,600	\$553,000	\$91,600
1990	2	\$220,100	\$546,600	\$83,500
1991	1	\$232,500	\$537,700	\$67,700
1992	5	\$183,200	\$405,200	\$25,300
1993	1	\$197,500	\$433,400	\$27,500
1994	3	\$193,400	\$398,700	\$49,800
1995	1	\$182,800	\$379,600	\$41,200
1996	2	\$166,000	\$331,400	\$25,600
1997	0	\$166,000	\$331,400	\$25,600
1998	0	\$166,000	\$331,400	\$25,600
1999	1	\$102,100	\$131,200	\$103,300
2000	3	\$53,800	\$98,300	\$12,000
2001	0	\$48,800	\$86,900	\$21,400
2002	1	\$34,500	\$54,500	\$34,500
2003	5	\$14,600	\$24,600	\$1,300
2004	3	\$17,200	\$28,300	\$4,100
2005	0	\$24,000	\$38,700	\$10,000
2006	2	\$31,000	\$49,500	\$10,500
2007	4	\$34,900	\$52,200	\$7,100
2008	14	\$53,900	\$77,700	\$14,400
2009	4	\$73,000	\$105,500	\$3,600
2010	6	\$60,000	\$85,400	\$4,200
2011	5	\$55,800	\$77,000	\$3,600
2012	5	\$65,500	\$88,500	\$8,100
2013	1	\$67,800	\$91,300	\$7,600
2014	2	\$65,900	\$86,700	\$8,200
2015	2	\$56,900	\$72,600	\$10,100
2016	4	\$57,400	\$74,200	\$7,000
2017	4	\$57,800	\$73,200	\$6,900
2018	4	\$97,500	\$120,500	\$34,700
2019	12	\$154,800	\$188,000	\$21,200
2020	2	\$164,200	\$198,200	\$26,900
2021	3	\$136,900	\$156,800	\$23,400
2022	4	\$166,200	\$176,300	\$4,400
2023	1	\$175,000	\$183,500	\$12,400
2024	1	\$175,000	\$176,900	\$16,200

- *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.*

Alaska Peninsula Salmon Purse Seine Vessel Characteristics

Table 2-9 reports on various vessel characteristics of the Alaska Peninsula salmon purse seine 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 described characteristics; other statistics reported include the 25th percentile, the median, and the 75th percentile.

Table 2-9. Alaska Peninsula Salmon Purse Seine Vessel Characteristics

Year	Vessel		Age			Length(ft)			Horsepower			Refrigeration			Hold Capacity(ft ³)					
	count	Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Count	Considered	Count	25%	Median	75%	
1978	117	94	4	9	16	100	28	32	39	95	120	165	220	87	5	5.7%	39	150	500	1735
1979	139	116	2	7	17	119	28	35	46	108	130	175	239	101	9	8.9%	47	200	650	1735
1980	154	128	2	7	15	132	30	37	49	117	135	200	300	118	18	15.3%	61	380	1200	1800
1981	149	129	2	6	13	130	32	40	49	116	165	230	330	115	20	17.4%	64	473	1200	2000
1982	165	133	3	7	15	135	32	42	49	123	165	225	315	119	23	19.3%	64	493	1200	2000
1983	138	118	3	5	12	119	36	46	49	115	185	265	360	109	29	26.6%	65	700	1200	1800
1984	135	114	4	6	13	116	37	47	49	113	190	270	360	105	28	26.7%	69	700	1200	2000
1985	138	126	5	7	13	127	38	47	49	123	195	280	365	114	32	28.1%	76	700	1200	1875
1986	131	124	6	8	12	125	38	47	49	123	200	290	365	111	37	33.3%	73	780	1200	1950
1987	129	126	6	8	15	127	36	44	49	126	195	273	365	115	33	28.7%	78	600	1150	1735
1988	138	130	8	9	16	132	37	44	49	130	200	290	365	117	31	26.5%	84	500	1000	1738
1989	129	124	9	11	17	125	38	48	49	124	228	305	365	114	37	32.5%	80	675	1100	1738
1990	151	134	9	11	16	135	39	48	49	134	230	318	365	124	42	33.9%	85	780	1200	1740
1991	131	124	9	12	16	125	42	49	49	124	250	340	370	114	49	43.0%	85	800	1200	2000
1992	126	123	10	13	17	124	44	49	49	124	255	350	390	113	53	46.9%	83	840	1200	2000
1993	131	126	10	13	16	127	44	49	50	126	270	360	440	114	59	51.8%	90	900	1200	2000
1994	135	130	11	14	17	131	44	49	50	127	270	355	450	120	61	50.8%	86	900	1200	2000
1995	139	128	13	16	20	129	44	49	50	126	275	358	443	122	63	51.6%	89	900	1200	2000
1996	105	103	13	16	18	103	46	53	58	99	300	365	440	97	56	57.7%	74	900	1250	2000
1997	84	84	14	17	21	84	47	53	58	83	300	360	440	78	48	61.5%	59	900	1300	2000
1998	122	97	16	18	21	97	38	50	58	94	250	333	400	91	49	53.8%	62	700	1150	1740
1999	101	75	17	19	24	75	47	53	58	74	290	350	400	73	46	63.0%	55	850	1200	2000
2000	90	79	17	20	25	79	47	54	58	77	300	350	420	77	50	64.9%	57	870	1200	1950
2001	68	65	18	21	24	65	46	52	58	64	295	360	428	61	37	60.7%	47	800	1200	1735
2002	56	47	16	22	25	47	46	52	58	47	275	350	420	45	28	62.2%	34	800	1000	1600
2003	48	48	22	24	27	48	47	53	58	48	300	358	410	47	33	70.2%	36	885	1150	2000
2004	50	43	21	24	28	43	48	53	58	42	300	360	415	42	31	73.8%	34	900	1100	1735
2005	67	49	19	25	28	49	46	53	58	49	300	365	500	48	36	75.0%	33	870	1200	2000
2006	56	46	21	26	30	46	47	55	58	46	320	365	465	45	34	75.6%	34	870	1250	2200
2007	54	48	24	27	31	48	46	54	58	48	300	365	473	46	35	76.1%	34	750	1150	2000
2008	71	57	22	28	31	58	46	53	58	58	300	360	440	56	41	73.2%	39	850	1200	2000
2009	77	57	23	29	32	57	46	55	58	56	323	363	450	55	44	80.0%	41	800	1300	2000
2010	65	65	24	30	34	65	47	56	58	64	314	358	468	63	52	82.5%	48	825	1300	2100
2011	59	58	28	31	35	58	46	54	58	58	310	365	440	56	43	76.8%	39	850	1300	2000
2012	56	54	29	32	35	54	48	55	58	53	330	365	450	52	45	86.5%	39	870	1300	2200
2013	60	60	30	33	37	60	47	53	58	60	300	365	450	58	44	75.9%	43	870	1200	2000
2014	53	53	29	34	37	53	48	55	58	52	305	365	458	50	41	82.0%	37	850	1300	2000
2015	64	58	30	35	39	59	48	57	58	58	325	365	465	56	46	82.1%	41	870	1400	2000
2016	51	49	31	36	41	49	51	58	58	48	328	365	450	46	42	91.3%	37	1000	1400	2000
2017	52	52	33	37	42	52	48	57	58	51	325	375	465	49	42	85.7%	36	1000	1500	2200
2018	53	53	33	38	43	53	51	58	58	52	328	365	475	50	46	92.0%	38	1000	1650	2200
2019	68	68	32	39	42	68	51	58	58	67	330	365	500	65	59	90.8%	50	1000	1650	2200
2020	59	59	33	40	43	59	51	58	58	58	340	400	500	56	53	94.6%	45	1000	1735	2200
2021	64	64	34	41	46	64	52	58	58	63	330	400	500	61	57	93.4%	49	1000	1600	2200
2022	68	68	35	42	45	68	51	58	58	67	340	400	500	66	61	92.4%	52	1150	1900	2250
2023	64	64	36	43	46	64	51	58	58	63	335	400	500	62	56	90.3%	48	1100	1718	2200
2024	54	54	37	44	49	54	52	58	58	53	335	400	500	52	49	94.2%	42	1100	1768	2200
Total	837					541	32	42	53	513	170	290	375	486	187	38.5%	296	453	1000	1975

- Total includes every vessel from 1978 to 2024.

Table 2-10 provides additional Alaska Peninsula salmon purse seine vessel characteristics. Included are statistics of engine propulsion and hull material for each year since 1978.

Alaska Peninsula Salmon Purse Seine (S01M)

Table 2-10. Additional Alaska Peninsula Salmon Purse Seine Vessel Characteristics

Year	Vessel Count	Engine Power				Hull Material													
		Count	Diesel	Gas	Count	Aluminum	Fiberglass	Concrete	Steel	Rubber	Wood								
1978	117	98	64	65.3%	34	34.7%	100	0	0.0%	20	20.0%	0	0.0%	8	8.0%	0	0.0%	72	72.0%
1979	139	115	82	71.3%	33	28.7%	119	0	0.0%	43	36.1%	0	0.0%	11	9.2%	0	0.0%	65	54.6%
1980	154	128	101	78.9%	27	21.1%	132	1	0.8%	53	40.2%	0	0.0%	17	12.9%	0	0.0%	61	46.2%
1981	149	128	109	85.2%	19	14.8%	128	0	0.0%	63	49.2%	0	0.0%	16	12.5%	0	0.0%	49	38.3%
1982	165	133	113	85.0%	20	15.0%	132	4	3.0%	58	43.9%	0	0.0%	20	15.2%	0	0.0%	50	37.9%
1983	138	118	106	89.8%	12	10.2%	116	0	0.0%	63	54.3%	0	0.0%	22	19.0%	0	0.0%	31	26.7%
1984	135	116	101	87.1%	15	12.9%	115	0	0.0%	61	53.0%	0	0.0%	23	20.0%	0	0.0%	31	27.0%
1985	138	127	115	90.6%	12	9.4%	126	2	1.6%	69	54.8%	0	0.0%	25	19.8%	0	0.0%	30	23.8%
1986	131	125	111	88.8%	14	11.2%	123	3	2.4%	72	58.5%	0	0.0%	22	17.9%	0	0.0%	26	21.1%
1987	129	127	111	87.4%	16	12.6%	126	6	4.8%	69	54.8%	0	0.0%	22	17.5%	0	0.0%	29	23.0%
1988	138	132	115	87.1%	17	12.9%	131	3	2.3%	74	56.5%	0	0.0%	21	16.0%	0	0.0%	33	25.2%
1989	129	125	113	90.4%	12	9.6%	125	1	0.8%	72	57.6%	0	0.0%	23	18.4%	0	0.0%	29	23.2%
1990	151	135	123	91.1%	12	8.9%	135	1	0.7%	82	60.7%	0	0.0%	26	19.3%	0	0.0%	26	19.3%
1991	131	125	116	92.8%	9	7.2%	125	2	1.6%	75	60.0%	0	0.0%	26	20.8%	0	0.0%	22	17.6%
1992	126	124	116	93.5%	8	6.5%	124	2	1.6%	77	62.1%	0	0.0%	25	20.2%	0	0.0%	20	16.1%
1993	131	127	120	94.5%	7	5.5%	127	3	2.4%	78	61.4%	0	0.0%	27	21.3%	1	0.8%	18	14.2%
1994	135	131	125	95.4%	6	4.6%	131	3	2.3%	87	66.4%	0	0.0%	23	17.6%	0	0.0%	18	13.7%
1995	139	129	123	95.3%	6	4.7%	129	3	2.3%	83	64.3%	0	0.0%	26	20.2%	0	0.0%	17	13.2%
1996	105	103	100	97.1%	3	2.9%	103	0	0.0%	72	69.9%	0	0.0%	20	19.4%	0	0.0%	11	10.7%
1997	84	84	81	96.4%	3	3.6%	83	0	0.0%	56	67.5%	0	0.0%	17	20.5%	0	0.0%	10	12.0%
1998	122	97	86	88.7%	11	11.3%	97	8	8.2%	63	64.9%	0	0.0%	15	15.5%	0	0.0%	11	11.3%
1999	101	75	74	98.7%	1	1.3%	75	0	0.0%	51	68.0%	0	0.0%	16	21.3%	0	0.0%	8	10.7%
2000	90	78	77	98.7%	1	1.3%	79	0	0.0%	52	65.8%	0	0.0%	19	24.1%	0	0.0%	8	10.1%
2001	68	65	64	98.5%	1	1.5%	65	0	0.0%	49	75.4%	0	0.0%	10	15.4%	0	0.0%	6	9.2%
2002	56	47	43	91.5%	4	8.5%	47	2	4.3%	32	68.1%	0	0.0%	8	17.0%	0	0.0%	5	10.6%
2003	48	48	47	97.9%	1	2.1%	48	0	0.0%	34	70.8%	0	0.0%	10	20.8%	0	0.0%	4	8.3%
2004	50	43	42	97.7%	1	2.3%	43	2	4.7%	28	65.1%	0	0.0%	9	20.9%	0	0.0%	4	9.3%
2005	67	49	47	95.9%	2	4.1%	49	4	8.2%	29	59.2%	0	0.0%	12	24.5%	0	0.0%	4	8.2%
2006	56	46	43	93.5%	3	6.5%	46	2	4.3%	29	63.0%	0	0.0%	12	26.1%	0	0.0%	3	6.5%
2007	54	48	46	95.8%	2	4.2%	48	1	2.1%	32	66.7%	0	0.0%	12	25.0%	0	0.0%	3	6.3%
2008	71	58	57	98.3%	1	1.7%	58	3	5.2%	38	65.5%	0	0.0%	14	24.1%	0	0.0%	3	5.2%
2009	77	57	56	98.2%	1	1.8%	57	2	3.5%	35	61.4%	0	0.0%	17	29.8%	0	0.0%	3	5.3%
2010	65	65	63	96.9%	2	3.1%	65	2	3.1%	38	58.5%	0	0.0%	21	32.3%	0	0.0%	4	6.2%
2011	59	58	57	98.3%	1	1.7%	58	1	1.7%	39	67.2%	0	0.0%	15	25.9%	0	0.0%	3	5.2%
2012	56	54	54	100.0%	0	0.0%	54	1	1.9%	36	66.7%	0	0.0%	15	27.8%	0	0.0%	2	3.7%
2013	60	60	60	100.0%	0	0.0%	60	0	0.0%	43	71.7%	0	0.0%	14	23.3%	0	0.0%	3	5.0%
2014	53	53	53	100.0%	0	0.0%	52	0	0.0%	36	69.2%	0	0.0%	14	26.9%	0	0.0%	2	3.8%
2015	64	59	58	98.3%	1	1.7%	58	2	3.4%	36	62.1%	0	0.0%	16	27.6%	0	0.0%	4	6.9%
2016	51	49	48	98.0%	1	2.0%	48	1	2.1%	29	60.4%	0	0.0%	15	31.3%	0	0.0%	3	6.3%
2017	52	52	52	100.0%	0	0.0%	51	0	0.0%	33	64.7%	0	0.0%	15	29.4%	0	0.0%	3	5.9%
2018	53	53	53	100.0%	0	0.0%	52	0	0.0%	29	55.8%	0	0.0%	20	38.5%	0	0.0%	3	5.8%
2019	68	68	68	100.0%	0	0.0%	67	0	0.0%	40	59.7%	0	0.0%	24	35.8%	0	0.0%	3	4.5%
2020	59	59	59	100.0%	0	0.0%	58	1	1.7%	31	53.4%	0	0.0%	23	39.7%	0	0.0%	3	5.2%
2021	64	64	64	100.0%	0	0.0%	63	1	1.6%	34	54.0%	0	0.0%	25	39.7%	0	0.0%	3	4.8%
2022	68	68	68	100.0%	0	0.0%	67	1	1.5%	37	55.2%	0	0.0%	27	40.3%	0	0.0%	2	3.0%
2023	64	64	64	100.0%	0	0.0%	63	0	0.0%	35	55.6%	0	0.0%	27	42.9%	0	0.0%	1	1.6%
2024	54	54	54	100.0%	0	0.0%	53	1	1.9%	29	54.7%	0	0.0%	22	41.5%	0	0.0%	1	1.9%
Total	837	536	435	81.2%	101	18.8%	537	44	8.2%	272	50.7%	0	0.0%	85	15.8%	1	0.2%	135	25.1%

• Totals includes every vessel from 1978 to 2024.

Participation and Earnings

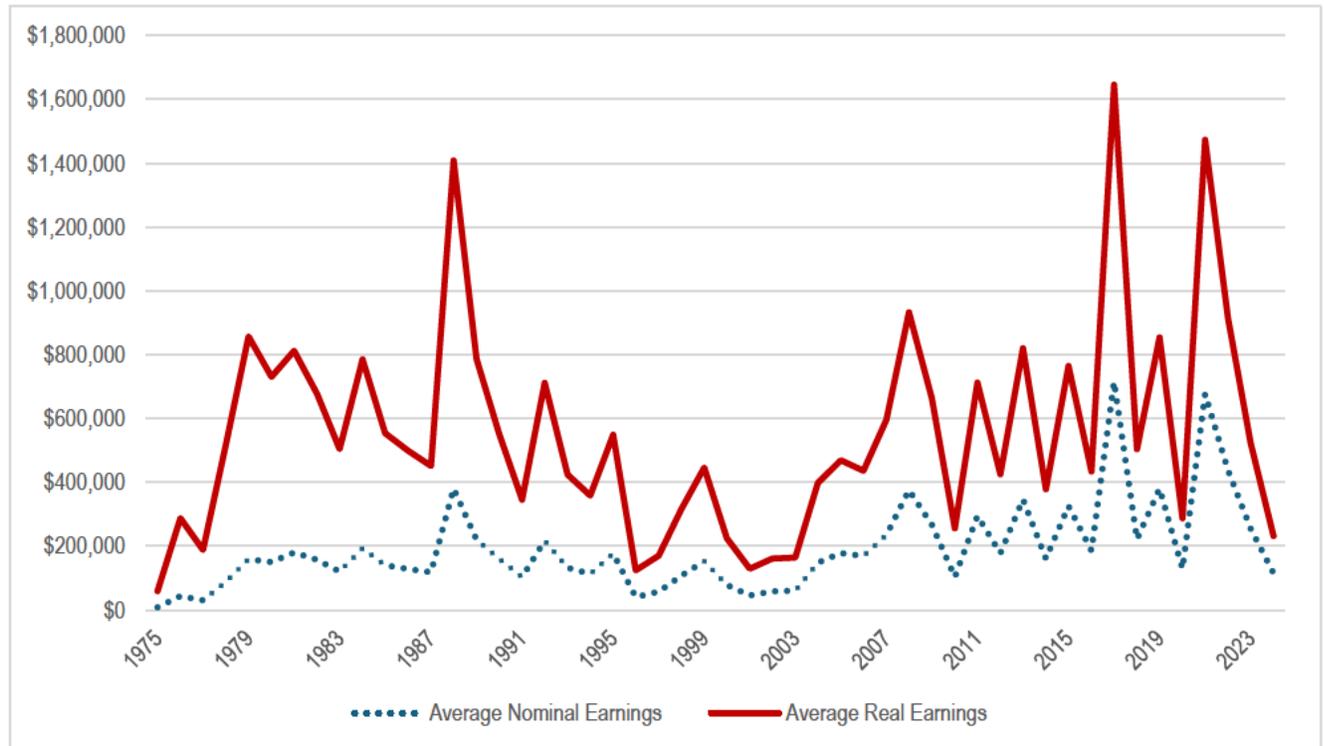
Earnings are estimated from weighted average ex-vessel prices, and as noted earlier, come primarily from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 2-4 reflect both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of 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 Alaska Peninsula salmon purse seine 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 2-11 reports the number of permits issued, and estimated gross earnings in the Alaska Peninsula salmon purse seine fishery from 1975 to 2024. Note that the figures by permit or vessel in this table span the entire year, regardless of who held the permit or however many times the permit was transferred.

Table 2-12 reports the number of permit holders (people) and estimated real (inflation adjusted) gross earnings by each resident type.

Figure 2-4. Estimated Nominal and Real Average Gross Earnings Per Alaska Peninsula Salmon Purse Seine Permit



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

Alaska Peninsula Salmon Purse Seine (S01M)

Table 2-11. Estimated Total Gross Earnings (Real and Nominal) for the Alaska Peninsula Salmon Purse Seine Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2024

Year	Permits Issued	Total Gross Earnings		Permits with Landings	Average Nominal Earnings	Average Real Earnings	Vessels with Landings	Average Real Vessel Earnings
		Nominal	Real					
1975	123	\$462,882	\$2,744,054	54	\$8,572	\$50,816	60	\$45,734
1976	113	\$3,742,997	\$20,978,004	86	\$43,523	\$243,930	108	\$194,241
1977	113	\$2,463,393	\$12,967,302	82	\$30,041	\$158,138	86	\$150,783
1978	123	\$9,793,597	\$47,898,526	111	\$88,231	\$431,518	109	\$439,436
1979	123	\$18,740,706	\$82,386,019	118	\$158,820	\$698,187	121	\$680,876
1980	125	\$18,433,550	\$71,396,826	123	\$149,866	\$580,462	133	\$536,818
1981	127	\$21,974,046	\$77,106,927	122	\$180,115	\$632,024	129	\$597,728
1982	127	\$18,253,544	\$60,335,263	116	\$157,358	\$520,132	131	\$460,575
1983	127	\$14,514,217	\$46,506,455	121	\$119,952	\$384,351	123	\$378,101
1984	126	\$23,346,723	\$71,676,773	121	\$192,948	\$592,370	123	\$582,738
1985	127	\$17,193,163	\$50,986,325	123	\$139,782	\$414,523	129	\$395,243
1986	125	\$15,470,130	\$45,001,060	121	\$127,852	\$371,910	125	\$360,008
1987	125	\$13,634,984	\$38,292,488	115	\$118,565	\$332,978	125	\$306,340
1988	124	\$43,446,475	\$117,209,899	114	\$381,109	\$1,028,157	125	\$937,679
1989	126	\$26,173,328	\$67,383,233	119	\$219,944	\$566,246	122	\$552,322
1990	126	\$19,425,259	\$47,438,424	121	\$160,539	\$392,053	126	\$376,495
1991	126	\$12,412,912	\$29,087,176	120	\$103,441	\$242,393	122	\$238,419
1992	125	\$25,851,950	\$58,792,505	119	\$217,243	\$494,055	123	\$477,988
1993	125	\$16,155,304	\$35,680,604	122	\$132,421	\$292,464	124	\$287,747
1994	124	\$13,522,327	\$29,109,514	119	\$113,633	\$244,618	128	\$227,418
1995	124	\$20,927,345	\$43,821,861	118	\$177,350	\$371,372	124	\$353,402
1996	124	\$4,139,174	\$8,419,907	101	\$40,982	\$83,365	102	\$82,548
1997	122	\$4,677,464	\$9,297,863	82	\$57,042	\$113,389	84	\$110,689
1998	122	\$8,448,356	\$16,537,658	79	\$106,941	\$209,337	83	\$199,249
1999	121	\$11,325,415	\$21,693,833	74	\$153,046	\$293,160	74	\$293,160
2000	121	\$5,988,400	\$11,097,105	76	\$78,795	\$146,015	77	\$144,118
2001	121	\$2,942,906	\$5,303,999	64	\$45,983	\$82,875	65	\$81,600
2002	121	\$2,440,835	\$4,330,042	42	\$58,115	\$103,096	45	\$96,223
2003	116	\$2,768,854	\$4,801,747	46	\$60,192	\$104,386	48	\$100,036
2004	119	\$6,231,259	\$10,525,220	42	\$148,363	\$250,600	41	\$256,713
2005	115	\$8,198,909	\$13,397,837	46	\$178,237	\$291,257	45	\$297,730
2006	114	\$7,257,934	\$11,490,035	43	\$168,789	\$267,210	44	\$261,137
2007	116	\$10,796,933	\$16,615,400	46	\$234,716	\$361,204	45	\$369,231
2008	116	\$20,666,856	\$30,636,547	55	\$375,761	\$557,028	53	\$578,048
2009	118	\$14,397,480	\$21,410,493	54	\$266,620	\$396,491	58	\$369,146
2010	118	\$6,536,660	\$9,564,441	63	\$103,757	\$151,817	63	\$151,817
2011	117	\$17,378,750	\$24,653,494	59	\$294,555	\$417,856	58	\$425,060
2012	116	\$9,974,630	\$13,862,741	56	\$178,118	\$247,549	53	\$261,561
2013	116	\$20,785,242	\$28,471,625	60	\$346,421	\$474,527	60	\$474,527
2014	116	\$7,909,310	\$10,661,750	49	\$161,414	\$217,587	52	\$205,034
2015	116	\$18,581,042	\$25,015,657	57	\$325,983	\$438,871	56	\$446,708
2016	116	\$9,134,075	\$12,143,753	49	\$186,410	\$247,832	48	\$252,995
2017	117	\$39,340,702	\$51,209,792	55	\$715,285	\$931,087	52	\$984,804
2018	116	\$11,994,084	\$15,242,082	54	\$222,113	\$282,261	52	\$293,117
2019	114	\$26,990,477	\$33,686,814	71	\$380,148	\$474,462	68	\$495,394
2020	115	\$8,247,666	\$10,166,898	64	\$128,870	\$158,858	59	\$172,320
2021	115	\$46,692,764	\$54,985,399	69	\$676,707	\$796,890	64	\$859,147
2022	115	\$31,481,647	\$34,327,587	72	\$437,245	\$476,772	68	\$504,817
2023	116	\$17,879,628	\$18,723,547	70	\$255,423	\$267,479	64	\$292,555
2024	115	\$6,439,593	\$6,550,354	56	\$114,993	\$116,971	54	\$121,303

- 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.

Alaska Peninsula Salmon Purse Seine (S01M)

Table 2-12. Estimated Real Gross Earnings for Permit Holders in the Alaska Peninsula Salmon Purse Seine Fishery by Resident Type, 1975-2024

Year	Local			Nonlocal			Nonresident			Total		
	People	Average	Total	People	Average	Total	People	Average	Total	People	Average	Total
1975	44	\$46,638	\$2,052,056	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	54	\$50,816	\$2,744,054
1976	76	\$238,439	\$18,121,329	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	88	\$238,386	\$20,978,004
1977	74	\$157,609	\$11,663,051	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	83	\$156,233	\$12,967,302
1978	98	\$415,889	\$40,757,095	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	111	\$431,518	\$47,898,526
1979	105	\$600,331	\$63,034,782	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	120	\$686,550	\$82,386,019
1980	99	\$517,197	\$51,202,523	4	\$473,216	\$1,892,863	21	\$871,497	\$18,301,440	124	\$575,781	\$71,396,826
1981	100	\$578,633	\$57,863,300	5	\$540,556	\$2,702,780	18	\$918,936	\$16,540,847	123	\$626,886	\$77,106,927
1982	93	\$474,380	\$44,117,370	4	\$443,112	\$1,772,447	21	\$687,878	\$14,445,447	118	\$511,316	\$60,335,263
1983	96	\$346,572	\$33,270,950	6	\$495,987	\$2,975,924	20	\$512,979	\$10,259,581	122	\$381,200	\$46,506,455
1984	93	\$558,104	\$51,903,676	11	\$601,307	\$6,614,381	19	\$692,564	\$13,158,716	123	\$582,738	\$71,676,773
1985	97	\$376,072	\$36,478,997	12	\$408,597	\$4,903,158	20	\$480,208	\$9,604,170	129	\$395,243	\$50,986,325
1986	91	\$355,100	\$32,314,103	11	\$369,242	\$4,061,667	20	\$431,265	\$8,625,290	122	\$368,861	\$45,001,060
1987	90	\$298,332	\$26,849,864	6	\$304,991	\$1,829,946	23	\$417,943	\$9,612,678	119	\$321,786	\$38,292,488
1988	89	\$946,500	\$84,238,538	4	\$761,005	\$3,044,022	23	\$1,301,189	\$29,927,339	116	\$1,010,430	\$117,209,899
1989	88	\$533,923	\$46,985,252	5	\$305,492	\$1,527,462	27	\$698,908	\$18,870,519	120	\$561,527	\$67,383,233
1990	87	\$359,762	\$31,299,335	5	\$310,030	\$1,550,150	29	\$503,067	\$14,588,940	121	\$392,053	\$47,438,424
1991	90	\$230,722	\$20,764,936	7	\$252,733	\$1,769,129	26	\$252,043	\$6,553,111	123	\$236,481	\$29,087,176
1992	85	\$469,187	\$39,880,917	7	\$462,341	\$3,236,387	30	\$522,507	\$15,675,201	122	\$481,906	\$58,792,505
1993	87	\$289,684	\$25,202,533	4	\$346,529	\$1,386,116	34	\$267,410	\$9,091,956	125	\$285,445	\$35,680,604
1994	88	\$229,624	\$20,206,946	5	\$230,963	\$1,154,813	28	\$276,706	\$7,747,755	121	\$240,574	\$29,109,514
1995	85	\$359,896	\$30,591,165	6	\$305,236	\$1,831,417	27	\$422,195	\$11,399,278	118	\$371,372	\$43,821,861
1996	78	\$81,640	\$6,367,889	5	\$71,378	\$356,892	20	\$84,756	\$1,695,127	103	\$81,747	\$8,419,907
1997	66	\$115,023	\$7,591,486	4	\$98,910	\$395,641	15	\$87,382	\$1,310,736	85	\$109,387	\$9,297,863
1998	67	\$199,601	\$13,373,261	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	79	\$209,337	\$16,537,658
1999	62	\$292,347	\$18,125,510	4	\$195,156	\$780,623	9	\$309,744	\$2,787,700	75	\$289,251	\$21,693,833
2000	62	\$136,584	\$8,468,187	4	\$108,771	\$435,084	13	\$168,756	\$2,193,834	79	\$140,470	\$11,097,105
2001	59	\$76,909	\$4,537,615	1 to 3	Confidential	Confidential	1 to 3	Confidential	Confidential	65	\$81,600	\$5,303,999
2002	38	\$99,836	\$3,793,750	Confidential	Confidential	Confidential	1 to 3	Confidential	Confidential	43	\$100,699	\$4,330,042
2003	37	\$102,323	\$3,785,968	Confidential	Confidential	Confidential	1 to 3	Confidential	Confidential	46	\$104,386	\$4,801,747
2004	33	\$248,273	\$8,193,007	4	\$205,143	\$820,572	5	\$302,328	\$1,511,640	42	\$250,600	\$10,525,220
2005	34	\$301,066	\$10,236,243	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	45	\$297,730	\$13,397,837
2006	34	\$239,274	\$8,135,307	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	44	\$261,137	\$11,490,035
2007	35	\$345,609	\$12,096,324	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	46	\$361,204	\$16,615,400
2008	42	\$484,451	\$20,346,956	6	\$491,848	\$2,951,090	11	\$667,136	\$7,338,500	59	\$519,264	\$30,636,547
2009	39	\$370,323	\$14,442,589	4	\$480,852	\$1,923,409	12	\$420,375	\$5,044,495	55	\$389,282	\$21,410,493
2010	42	\$128,783	\$5,408,906	5	\$183,358	\$916,790	19	\$170,460	\$3,238,745	66	\$144,916	\$9,564,441
2011	43	\$380,316	\$16,353,574	7	\$419,875	\$2,939,124	9	\$595,644	\$5,360,797	59	\$417,856	\$24,653,494
2012	40	\$238,157	\$9,526,290	7	\$197,202	\$1,380,414	9	\$328,449	\$2,956,037	56	\$247,549	\$13,862,741
2013	45	\$379,393	\$17,072,682	7	\$627,139	\$4,389,972	10	\$700,897	\$7,008,971	62	\$459,220	\$28,471,625
2014	37	\$182,474	\$6,751,529	7	\$311,265	\$2,178,857	6	\$288,561	\$1,731,364	50	\$213,235	\$10,661,750
2015	42	\$362,873	\$15,240,681	7	\$669,187	\$4,684,308	9	\$509,067	\$5,090,667	59	\$423,994	\$25,015,657
2016	32	\$211,261	\$6,760,354	8	\$339,720	\$2,717,763	10	\$296,182	\$2,665,635	49	\$247,832	\$12,143,753
2017	38	\$847,295	\$32,197,197	8	\$1,203,097	\$9,624,772	11	\$853,438	\$9,387,823	57	\$898,417	\$51,209,792
2018	34	\$241,345	\$8,205,734	9	\$431,205	\$3,880,846	12	\$262,958	\$3,155,501	55	\$277,129	\$15,242,082
2019	39	\$358,450	\$13,979,560	15	\$782,866	\$11,742,991	18	\$442,459	\$7,964,263	72	\$467,872	\$33,686,814
2020	34	\$116,292	\$3,953,941	13	\$264,682	\$3,440,870	17	\$163,064	\$2,772,088	64	\$158,858	\$10,166,898
2021	37	\$581,060	\$21,499,211	17	\$1,064,418	\$18,095,100	17	\$905,358	\$15,391,088	71	\$774,442	\$54,985,399
2022	36	\$348,347	\$12,540,503	21	\$632,299	\$13,278,269	18	\$472,712	\$8,508,815	75	\$457,701	\$34,327,587
2023	35	\$205,729	\$7,200,528	21	\$320,703	\$6,734,763	15	\$319,217	\$4,788,255	71	\$263,712	\$18,723,547
2024	31	\$76,962	\$2,385,821	16	\$176,056	\$2,816,895	10	\$134,764	\$1,347,638	57	\$114,918	\$6,550,354

- 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.

Chapter 3 Alaska Peninsula Salmon Drift Gillnet Fishery

S03M Permit Holdings

Limited entry permits for the Alaska Peninsula salmon drift gillnet fishery (S03M permits) were issued starting in 1975. CFEC has issued 162 S03M permits. Table 3-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 61.1% (99/162) of the permits, Nonlocal Alaskans received 8.6% (14/162) of the permits, and Nonresidents received 30.2% (49/162). Every S03M permit was issued as a transferable permit.

Table 3-1. Initial Issuance and Year-end 2024 Totals of Alaska Peninsula Salmon Drift Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

Residency	Initial Issue		Transfers		Migrations		Cancelled		2024 Year End	
	Total	Percent	Change	Percent Change	Change	Percent Change	Change	Percent Change	Total	Percent
Local	99	61.1%	-59	-59.6%	-9	-9.1%	0	0.0%	31	19.3%
Nonlocal	14	8.6%	54	385.7%	-5	-35.7%	-1	-7.1%	62	38.5%
Nonresident	49	30.2%	5	10.2%	14	28.6%	0	0.0%	68	42.2%
Total	162	100.0%	0		0		-1		161	

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 S03M 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.⁶ 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 3-2. Transfer Acquisition Methods for Alaska Peninsula Salmon Drift Gillnet Permits, 1980-2024

Acquisition Method	Alaska Peninsula Salmon Drift Gillnet		Combined Alaska Peninsula		Statewide Salmon Drift Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	198	32.9%	544	37.5%	4,117	30.8%	14,341	33.0%
Sale	352	58.5%	758	52.3%	8,280	61.9%	25,299	58.2%
Trade	13	2.2%	32	2.2%	127	0.9%	541	1.2%
Other	39	6.5%	115	7.9%	855	6.4%	3,294	7.6%
Total	602		1,449		13,379		43,475	

Table 3-2 compares the transfer acquisition methods for the S03M permits, all statewide salmon drift gillnet permits, and all limited entry permits between 1980 and 2024. Over half of all S03M transfers were sales (58.5% or 352/602), about a third were gifts (32.9% or 198/602), and a smaller percentage were trades (2.2% or 13/602) or other (6.5% or 39/602). The annual acquisition methods for S03M permits can be viewed in a different publication.⁷

⁶ CFEC implemented the transfer survey in 1980.

⁷ See *Changes in the Distribution of Alaska’s Commercial Fisheries Entry Permits, 1975-2024*, CFEC Report No. 22-2N.

Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 3-3. Relationships of Transferor to Transfer Recipients for Alaska Peninsula Salmon Drift Gillnet Permits, 1980-2024

Relationship	Alaska Peninsula Salmon Drift Gillnet		Combined Alaska Peninsula		Statewide Salmon Drift Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	103	17.1%	258	17.8%	2,235	16.7%	8,189	18.8%
Member of Immediate Family	193	32.1%	571	39.4%	4,152	31.0%	14,586	33.6%
Other Relative	34	5.6%	78	5.4%	560	4.2%	1,938	4.5%
Other	272	45.2%	542	37.4%	6,432	48.1%	18,762	43.2%
Total	602		1,449		13,379		43,475	

Table 3-3 shows the relationships between the transferors and transfer recipients for S03M permits, and compares S03M permit transfers with all statewide salmon drift gillnet permits, and all limited entry permits from 1980 to 2024. Transfers within the family, both between immediate family members and other relatives, total 37.7% (227/602) of all permit transfers for S03M permits compared 35.2% (4,712/13,379) for all salmon drift gillnet permits statewide, and 38.0% (16,524/43,475) for all limited entry permits statewide.

Emergency Transfers of S03M Permits

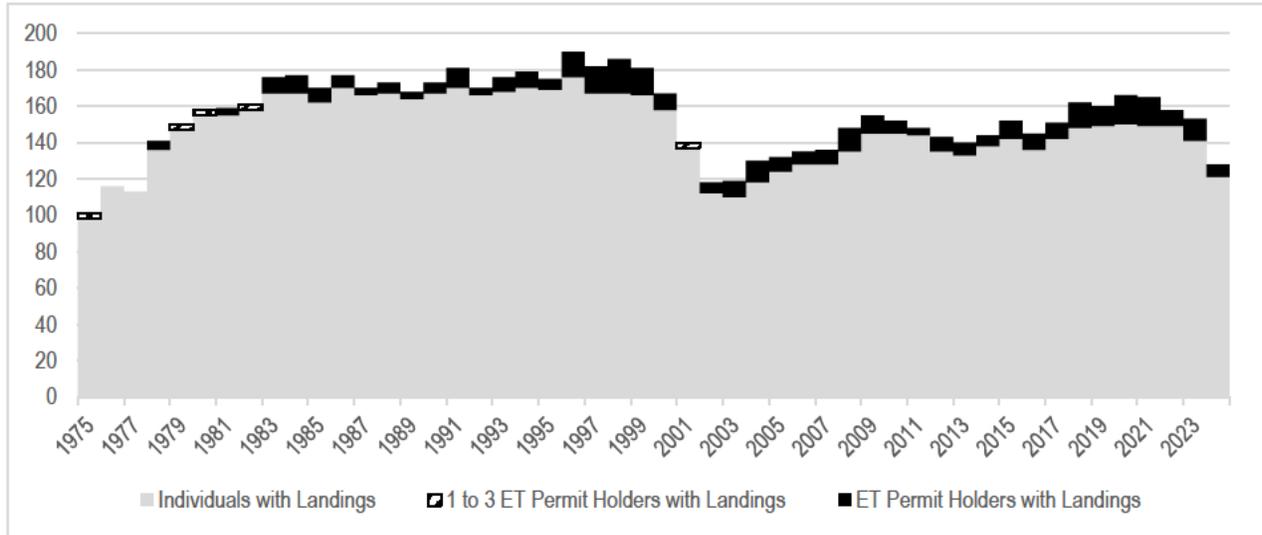
Commercial landings can be made with either permanently-held permits or with permits held temporarily through emergency transfers. Emergency transfers (ET) of permits are granted on permanent permits if illness, disability, death, required military or government service, or other unavoidable hardship 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 back to the permanent permit holder.

Table 3-4 and Figure 3-1 show 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.

Table 3-4. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024

Year	Individuals with Landings	ET Permit	
		Holders with Landings	ET Rate
1975	98	1 to 3	-
1976	116	0	0.0%
1977	113	0	0.0%
1978	136	5	3.7%
1979	147	1 to 3	-
1980	155	1 to 3	-
1981	155	4	2.6%
1982	158	1 to 3	-
1983	167	9	5.4%
1984	167	10	6.0%
1985	162	8	4.9%
1986	170	7	4.1%
1987	166	4	2.4%
1988	167	6	3.6%
1989	164	4	2.4%
1990	167	6	3.6%
1991	170	11	6.5%
1992	166	4	2.4%
1993	168	8	4.8%
1994	170	9	5.3%
1995	169	6	3.6%
1996	176	14	8.0%
1997	167	15	9.0%
1998	167	19	11.4%
1999	166	15	9.0%
2000	158	9	5.7%
2001	137	1 to 3	-
2002	112	6	5.4%
2003	110	9	8.2%
2004	118	12	10.2%
2005	124	8	6.5%
2006	128	7	5.5%
2007	128	8	6.3%
2008	135	13	9.6%
2009	145	10	6.9%
2010	145	7	4.8%
2011	144	4	2.8%
2012	135	8	5.9%
2013	133	7	5.3%
2014	138	6	4.3%
2015	142	10	7.0%
2016	136	9	6.6%
2017	142	9	6.3%
2018	148	14	9.5%
2019	149	11	7.4%
2020	150	16	10.7%
2021	149	16	10.7%
2022	149	9	6.0%
2023	141	12	8.5%
2024	121	7	5.8%

Figure 3-1. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024



Latent S03M Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they actually fish. Permits that are not used (do not record landings) in a given year are referred to herein as “latent” permits for that year.

Table 3-5 indicates the total number of issued S03M permits issued each year, the number of permits fished (with commercial landings), and the rate of permit latency. Issued 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 rate of latency is depicted in Figure 3-2.

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.

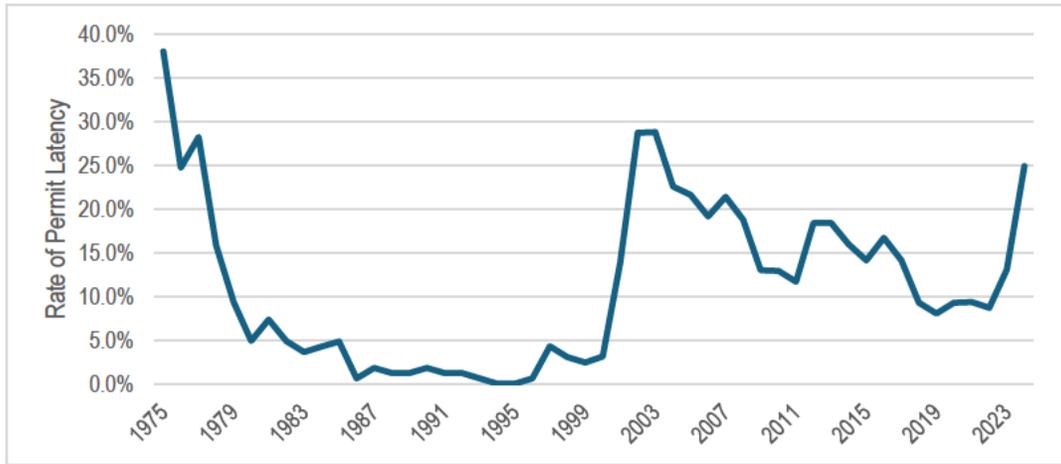
Table 3-5. Alaska Peninsula Salmon Drift Gillnet Permit Latency, 1975-2024

Year	Permits Issued	Permits Fished	Latency Rate
1975	158	98	38.0%
1976	154	116	24.7%
1977	156	112	28.2%
1978	158	133	15.8%
1979	161	146	9.3%
1980	163	155	4.9%
1981	164	152	7.3%
1982	164	156	4.9%
1983	165	159	3.6%
1984	165	158	4.2%
1985	166	158	4.8%
1986	165	164	0.6%
1987	166	163	1.8%
1988	164	162	1.2%
1989	165	163	1.2%
1990	165	162	1.8%
1991	164	162	1.2%
1992	164	162	1.2%
1993	164	163	0.6%
1994	164	164	0.0%
1995	164	164	0.0%
1996	164	163	0.6%
1997	164	157	4.3%
1998	164	159	3.0%
1999	164	160	2.4%
2000	161	156	3.1%
2001	159	137	13.8%
2002	157	112	28.7%
2003	153	109	28.8%
2004	151	117	22.5%
2005	153	120	21.6%
2006	157	127	19.1%
2007	159	125	21.4%
2008	160	130	18.8%
2009	162	141	13.0%
2010	163	142	12.9%
2011	163	144	11.7%
2012	163	133	18.4%
2013	163	133	18.4%
2014	163	137	16.0%
2015	163	140	14.1%
2016	162	135	16.7%
2017	163	140	14.1%
2018	162	147	9.3%
2019	162	149	8.0%
2020	162	147	9.3%
2021	161	146	9.3%
2022	161	147	8.7%
2023	161	140	13.0%
2024	161	121	24.8%

- 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.

Alaska Peninsula Salmon Drift Gillnet (S03M)

Figure 3-2. Alaska Peninsula Salmon Drift Gillnet Permit Latency Rate, 1975-2024



New Entrants into the Alaska Peninsula Salmon Drift Gillnet Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S03M 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 3-6 and Figure 3-3 describe individuals rather than permits. An individual may hold up to two permits in this fishery but may only fish one of them. An individual may hold one S03M permit one year, and then in subsequent years hold a different S03M 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.

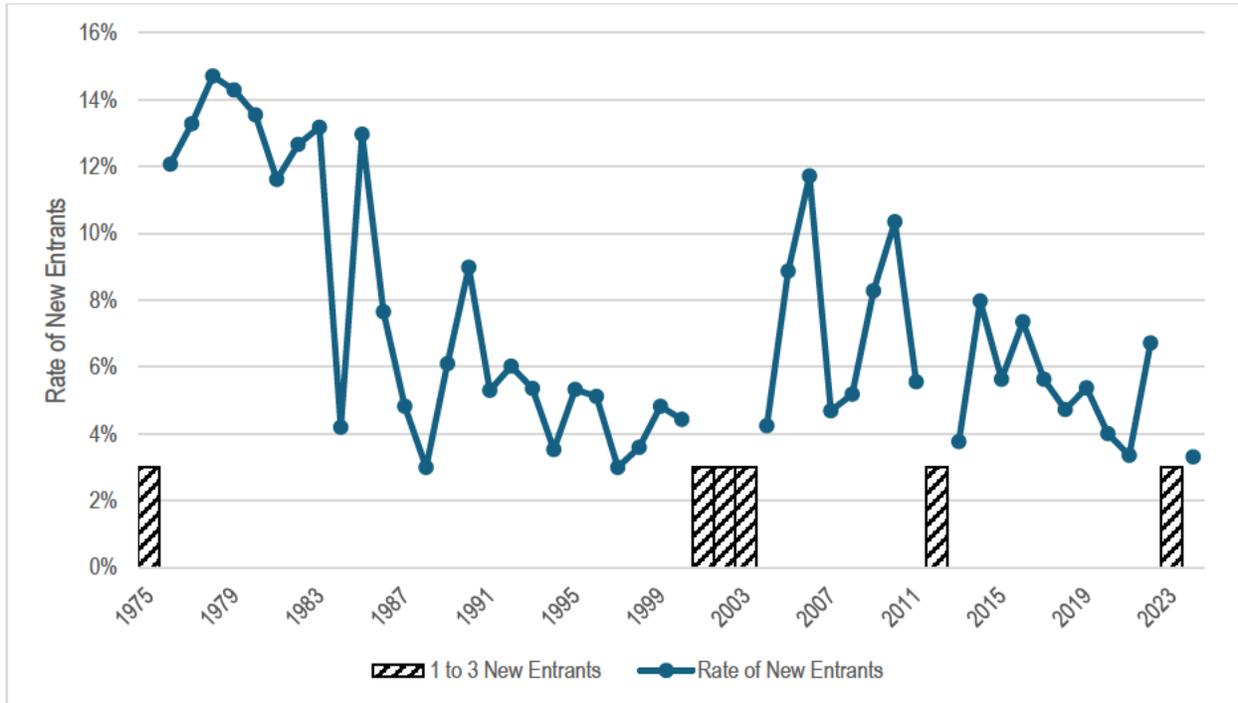
Table 3-6. New Entrants into the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024

Individuals w/ Landings		New Entrants	
Year	Count	Count	Percent
1975	98	1 to 3	-
1976	116	14	12.1%
1977	113	15	13.3%
1978	136	20	14.7%
1979	147	21	14.3%
1980	155	21	13.5%
1981	155	18	11.6%
1982	158	20	12.7%
1983	167	22	13.2%
1984	167	7	4.2%
1985	162	21	13.0%
1986	170	13	7.6%
1987	166	8	4.8%
1988	167	5	3.0%
1989	164	10	6.1%
1990	167	15	9.0%
1991	170	9	5.3%
1992	166	10	6.0%
1993	168	9	5.4%
1994	170	6	3.5%
1995	169	9	5.3%
1996	176	9	5.1%
1997	167	5	3.0%
1998	167	6	3.6%
1999	166	8	4.8%
2000	158	7	4.4%
2001	137	1 to 3	-
2002	112	1 to 3	-
2003	110	1 to 3	-
2004	118	5	4.2%
2005	124	11	8.9%
2006	128	15	11.7%
2007	128	6	4.7%
2008	135	7	5.2%
2009	145	12	8.3%
2010	145	15	10.3%
2011	144	8	5.6%
2012	135	1 to 3	-
2013	133	5	3.8%
2014	138	11	8.0%
2015	142	8	5.6%
2016	136	10	7.4%
2017	142	8	5.6%
2018	148	7	4.7%
2019	149	8	5.4%
2020	150	6	4.0%
2021	149	5	3.4%
2022	149	10	6.7%
2023	141	1 to 3	-
2024	121	4	3.3%

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

Alaska Peninsula Salmon Drift Gillnet (S03M)

Figure 3-3. New Entrants into the Alaska Peninsula Salmon Drift Gillnet Fishery, 1975-2024



Age of S03M Permit Holders

Table 3-7. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	Combined Statewide			Median AK Worker Age	
	AK S03M Peninsula	Salmon Drift Gillnet	All Permits		
1980	39.1	38.0	41.6	39.4	26.0
1981	37.6	37.3	41.3	39.4	26.4
1982	37.1	37.3	40.5	39.3	26.8
1983	36.4	36.1	40.4	39.4	27.1
1984	37.0	36.4	40.7	39.7	27.3
1985	35.3	36.8	40.9	40.0	27.5
1986	35.7	37.5	40.7	40.0	27.8
1987	36.1	38.0	41.1	40.3	28.2
1988	37.0	37.8	41.3	40.5	28.6
1989	37.1	38.3	41.5	40.9	29.0
1990	37.5	38.8	42.0	41.3	29.3
1991	37.7	39.1	42.3	41.8	29.7
1992	37.7	39.6	42.8	42.3	30.1
1993	38.9	41.0	43.1	42.8	30.5
1994	39.9	41.8	43.7	43.3	30.8
1995	40.6	42.5	43.9	43.7	31.1
1996	41.2	43.0	44.3	44.3	31.5
1997	42.6	43.8	45.0	44.9	31.8
1998	43.6	44.6	45.4	45.3	32.1
1999	43.7	45.5	45.9	45.9	32.3
2000	43.7	45.9	46.5	46.3	32.4
2001	44.9	46.7	47.1	46.8	32.7
2002	45.2	47.5	47.9	47.5	33.0
2003	47.7	48.5	48.3	48.1	33.2
2004	48.9	49.0	48.8	48.6	33.4
2005	47.4	48.3	49.0	49.0	33.6
2006	47.8	48.6	49.4	49.4	33.8
2007	48.8	49.3	49.5	49.8	33.9
2008	49.1	49.8	49.9	50.2	33.9
2009	49.3	50.6	50.2	50.6	33.9
2010	48.1	50.6	50.3	51.0	33.8
2011	48.8	51.3	50.6	51.3	33.9
2012	50.4	52.1	50.8	51.7	33.9
2013	50.4	52.3	50.8	51.8	34.0
2014	51.0	52.1	51.0	52.2	34.2
2015	51.7	53.1	51.2	52.6	34.4
2016	51.6	53.4	51.3	53.1	34.6
2017	52.3	54.2	51.6	53.6	34.8
2018	52.1	54.0	51.4	53.9	35.1
2019	49.4	54.2	51.4	54.0	35.4
2020	50.1	54.7	51.6	54.3	35.6
2021	50.5	55.3	51.3	54.6	36.0
2022	49.8	54.3	51.2	54.7	36.4
2023	51.5	54.7	50.8	55.0	36.5
2024	51.2	55.1	50.6	55.3	36.9

Table 3-7 shows the annual median age of five different cohorts of people: 1) Alaska Peninsula salmon drift gillnet (S03M) permit holders; 2) all Alaska Peninsula (Area M) permit holders; 3) all salmon drift gillnet permit holders statewide; 4) all CFEC limited entry permit holders; and 5) the Alaskan general 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 working age population has increased 10.9 years between 1980 and 2024. The change in ages over the same period for all CFEC permit holders was 15.9 years, and 9 years for the statewide drift gillnet permit holders.

For S03M permit holders, the median age increased 12.1 years.

- Median AK Working Age is the annual average age of all Alaskans age 16-64 as reported by the Alaska Department of Labor and Workforce Development, Research and Analysis Section.
- Age data from the CFEC permit file is as of December 31st of each year.

*Alaska Peninsula Salmon Drift Gillnet (S03M)***S03M Permit Value**

Many permit transfers are non-monetary transactions (see Table 3-2). Table 3-8 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 3-8. CFEC Estimated Value of Alaska Peninsula Salmon Drift Gillnet Permits

Year	S03M Permit Sales	Nominal Permit Value	Real Permit Value	Real Standard Deviation
1987	7	\$215,400	\$588,500	\$34,800
1988	2	\$235,000	\$628,900	\$21,400
1989	5	\$344,000	\$861,400	\$43,700
1990	13	\$356,500	\$846,700	\$36,000
1991	5	\$373,000	\$850,200	\$27,500
1992	7	\$319,300	\$706,300	\$55,900
1993	9	\$389,900	\$837,700	\$62,200
1994	4	\$329,800	\$690,500	\$60,300
1995	6	\$305,200	\$621,600	\$16,200
1996	7	\$301,400	\$596,400	\$16,500
1997	3	\$268,800	\$512,900	\$36,300
1998	1	\$228,800	\$435,200	\$107,500
1999	4	\$132,800	\$247,300	\$10,800
2000	3	\$131,400	\$238,900	\$13,700
2001	0	\$131,400	\$238,900	\$13,700
2002	6	\$24,800	\$42,900	\$4,600
2003	12	\$23,700	\$40,000	\$2,100
2004	4	\$28,200	\$46,300	\$7,900
2005	18	\$46,600	\$74,000	\$9,000
2006	7	\$73,100	\$112,600	\$17,600
2007	8	\$74,700	\$111,900	\$20,600
2008	7	\$97,900	\$141,100	\$17,200
2009	5	\$98,000	\$141,800	\$22,700
2010	15	\$108,100	\$153,800	\$9,900
2011	8	\$127,800	\$176,300	\$21,700
2012	3	\$112,400	\$145,300	\$27,100
2013	11	\$81,800	\$109,000	\$13,600
2014	8	\$98,000	\$128,500	\$16,600
2015	1	\$119,500	\$156,600	\$20,800
2016	5	\$103,900	\$134,400	\$12,300
2017	6	\$122,000	\$154,500	\$22,800
2018	7	\$160,700	\$198,600	\$12,000
2019	5	\$194,000	\$235,500	\$25,900
2020	5	\$194,000	\$232,600	\$8,800
2021	7	\$164,500	\$188,400	\$10,800
2022	10	\$172,100	\$182,500	\$11,200
2023	2	\$192,200	\$199,700	\$9,500
2024	3	\$153,500	\$147,400	\$28,600

- *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.*

Alaska Peninsula Salmon Drift Gillnet Vessel Characteristics

Table 3-9 reports on various vessel characteristics of the Alaska Peninsula 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 voluntary supplied information on vessels. The first column of each category is the count of vessel with the described characteristics; other statistics reported include the 25th percentile, median, and 75th percentile.

Table 3-9. Alaska Peninsula Salmon Drift Gillnet Vessel Characteristics

Year	Vessel Count	Age			Length(ft)				Horsepower				Refrigeration		Hold Capacity(ft ³)					
		Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	%	Count	25%	Median	75%	
1978	133	112	4	9	16	120	30	32	35	87	6	10	15	114	6	5.3%	68	150	160	355
1979	159	135	2	7	12	137	31	32	36	97	6	11	16	117	5	4.3%	73	150	180	432
1980	193	159	1	5	11	160	31	32	37	119	7	12	19	140	9	6.4%	84	150	245	436
1981	194	155	2	5	11	155	31	32	36	114	9	13	19	139	6	4.3%	80	150	236	400
1982	215	172	3	4	10	172	31	34	37	130	10	13	19	151	5	3.3%	83	150	310	432
1983	209	172	3	5	11	172	32	34	36	140	10	12	18	157	7	4.5%	90	160	320	450
1984	180	148	3	5	10	148	32	34	36	125	10	14	19	135	5	3.7%	86	200	338	450
1985	168	149	4	6	11	149	32	34	37	123	11	14	18	140	4	2.9%	94	200	344	495
1986	188	172	5	7	10	170	32	34	37	142	11	14	18	159	8	5.0%	114	216	347	495
1987	182	173	5	8	9	171	32	34	37	142	12	14	19	161	9	5.6%	116	216	347	488
1988	186	172	5	8	10	170	32	34	37	145	12	15	19	160	10	6.3%	110	260	350	500
1989	179	172	6	9	11	170	32	35	38	148	12	15	20	163	20	12.3%	120	255	350	506
1990	229	192	5	10	12	194	32	35	38	158	12	15	22	175	26	14.9%	123	272	355	500
1991	190	170	6	10	13	170	32	35	40	146	12	15	23	155	23	14.8%	116	271	383	500
1992	180	171	5	10	13	171	32	36	40	147	12	15	24	157	33	21.0%	114	260	380	500
1993	194	174	5	10	14	173	34	37	40	138	12	16	25	154	43	27.9%	106	300	396	525
1994	194	182	5	11	15	181	32	36	40	147	12	16	25	166	47	28.3%	107	280	392	500
1995	186	172	6	12	16	173	34	37	41	142	13	18	25	158	46	29.1%	106	300	389	500
1996	193	182	7	13	17	182	34	38	41	146	13	18	25	164	53	32.3%	108	300	400	548
1997	186	174	8	13	18	174	34	38	41	141	12	18	25	155	57	36.8%	102	300	400	561
1998	276	190	8	14	19	190	32	36	40	154	13	18	25	174	62	35.6%	115	300	400	561
1999	235	182	10	15	20	182	32	38	41	154	13	18	25	169	63	37.3%	110	300	400	565
2000	230	178	10	16	21	178	32	38	41	145	12	18	25	162	68	42.0%	108	300	400	600
2001	164	141	12	17	22	141	34	38	41	120	12	18	26	129	61	47.3%	88	300	400	519
2002	157	124	13	19	23	124	32	36	41	107	12	17	26	116	54	46.6%	78	300	350	500
2003	128	112	14	18	23	112	34	38	41	97	12	18	25	106	55	51.9%	69	300	365	500
2004	141	123	15	20	25	123	34	38	42	108	12	18	26	116	57	49.1%	73	300	350	500
2005	182	130	16	21	26	130	34	38	42	114	12	18	25	123	64	52.0%	77	300	380	500
2006	163	137	17	22	27	137	34	38	41	125	13	18	26	132	69	52.3%	86	300	386	520
2007	177	142	18	23	28	142	34	38	42	131	13	18	27	136	70	51.5%	82	300	425	600
2008	158	138	18	23	28	138	34	38	42	124	13	19	27	130	74	56.9%	81	300	400	520
2009	187	154	19	24	30	154	34	38	42	135	13	18	27	148	85	57.4%	84	300	420	556
2010	152	152	20	25	30	152	34	38	42	139	13	18	27	146	88	60.3%	89	272	400	525
2011	152	151	21	26	32	151	34	39	42	139	14	20	27	145	90	62.1%	88	290	465	600
2012	147	139	22	27	32	139	34	39	42	130	14	19	27	135	88	65.2%	81	300	460	600
2013	136	136	24	28	33	136	34	38	42	125	14	18	26	132	86	65.2%	80	286	400	550
2014	142	140	24	28	34	140	34	39	42	128	14	18	27	136	89	65.4%	84	286	400	600
2015	146	145	25	30	35	145	34	39	42	133	14	19	26	140	90	64.3%	91	300	400	600
2016	144	138	26	30	35	138	34	39	42	127	14	19	27	133	88	66.2%	82	300	445	610
2017	141	141	27	31	36	141	34	39	42	130	14	20	26	137	91	66.4%	81	300	470	700
2018	148	148	28	32	38	148	35	39	42	138	14	20	26	144	95	66.0%	88	300	483	700
2019	150	150	29	33	39	150	35	40	42	140	15	20	27	146	95	65.1%	89	300	470	640
2020	147	147	29	33	40	147	35	40	42	136	15	21	27	143	90	62.9%	86	324	455	600
2021	146	146	31	35	41	146	35	40	42	135	15	21	27	143	93	65.0%	87	330	480	610
2022	148	147	32	36	42	147	35	40	42	137	15	20	27	144	92	63.9%	92	322	475	670
2023	140	140	32	36	42	140	35	40	42	130	15	22	27	137	90	65.7%	86	340	500	700
2024	121	121	33	37	43	121	37	40	42	114	16	22	28	118	80	67.8%	75	338	500	700
Total	1588					896	29	34	40	682	11	16	26	824	219	26.6%	477	200	400	640

Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 3-10 provides additional Alaska Peninsula salmon drift gillnet vessel characteristics. Included are statistics of engine propulsion and hull material for each year since 1978.

Table 3-10. Additional Alaska Peninsula Salmon Drift Gillnet Vessel Characteristics

Year	Vessel Count	Engine Power					Hull Material										
		Count	Diesel	Gas	Count	Aluminum	Fiberglass	Concrete	Steel	Wood							
1978	133	120	92	76.7%	28	23.3%	120	3	2.5%	45	37.5%	0	0.0%	3	2.5%	69	57.5%
1979	159	134	109	81.3%	25	18.7%	135	6	4.4%	72	53.3%	0	0.0%	1	0.7%	56	41.5%
1980	193	156	129	82.7%	27	17.3%	154	10	6.5%	95	61.7%	1	0.6%	2	1.3%	46	29.9%
1981	194	154	131	85.1%	23	14.9%	149	6	4.0%	101	67.8%	0	0.0%	2	1.3%	40	26.8%
1982	215	171	145	84.8%	26	15.2%	164	11	6.7%	118	72.0%	0	0.0%	1	0.6%	34	20.7%
1983	209	171	149	87.1%	22	12.9%	172	10	5.8%	127	73.8%	0	0.0%	4	2.3%	31	18.0%
1984	180	146	136	93.2%	10	6.8%	147	5	3.4%	121	82.3%	0	0.0%	0	0.0%	21	14.3%
1985	168	149	139	93.3%	10	6.7%	149	9	6.0%	123	82.6%	0	0.0%	0	0.0%	17	11.4%
1986	188	171	162	94.7%	9	5.3%	172	10	5.8%	148	86.0%	0	0.0%	1	0.6%	13	7.6%
1987	182	172	163	94.8%	9	5.2%	171	13	7.6%	152	88.9%	0	0.0%	0	0.0%	6	3.5%
1988	186	171	161	94.2%	10	5.8%	172	16	9.3%	149	86.6%	0	0.0%	1	0.6%	6	3.5%
1989	179	172	163	94.8%	9	5.2%	172	13	7.6%	152	88.4%	0	0.0%	0	0.0%	7	4.1%
1990	229	194	175	90.2%	19	9.8%	193	23	11.9%	162	83.9%	0	0.0%	3	1.6%	5	2.6%
1991	190	169	165	97.6%	4	2.4%	169	13	7.7%	153	90.5%	0	0.0%	1	0.6%	2	1.2%
1992	180	171	164	95.9%	7	4.1%	170	15	8.8%	152	89.4%	0	0.0%	0	0.0%	3	1.8%
1993	194	173	165	95.4%	8	4.6%	173	20	11.6%	150	86.7%	0	0.0%	0	0.0%	3	1.7%
1994	194	182	170	93.4%	12	6.6%	181	25	13.8%	151	83.4%	0	0.0%	1	0.6%	4	2.2%
1995	186	173	167	96.5%	6	3.5%	172	22	12.8%	147	85.5%	0	0.0%	1	0.6%	2	1.2%
1996	193	180	173	96.1%	7	3.9%	181	26	14.4%	151	83.4%	0	0.0%	2	1.1%	1	0.6%
1997	186	173	163	94.2%	10	5.8%	173	24	13.9%	146	84.4%	0	0.0%	2	1.2%	1	0.6%
1998	276	189	176	93.1%	13	6.9%	190	32	16.8%	152	80.0%	0	0.0%	3	1.6%	3	1.6%
1999	235	182	175	96.2%	7	3.8%	181	29	16.0%	150	82.9%	0	0.0%	1	0.6%	1	0.6%
2000	230	177	168	94.9%	9	5.1%	178	27	15.2%	149	83.7%	0	0.0%	2	1.1%	0	0.0%
2001	164	141	138	97.9%	3	2.1%	141	19	13.5%	121	85.8%	0	0.0%	1	0.7%	0	0.0%
2002	157	124	117	94.4%	7	5.6%	124	18	14.5%	105	84.7%	0	0.0%	0	0.0%	1	0.8%
2003	128	111	108	97.3%	3	2.7%	111	14	12.6%	97	87.4%	0	0.0%	0	0.0%	0	0.0%
2004	141	123	118	95.9%	5	4.1%	123	15	12.2%	106	86.2%	0	0.0%	0	0.0%	2	1.6%
2005	182	129	124	96.1%	5	3.9%	128	14	10.9%	112	87.5%	0	0.0%	1	0.8%	1	0.8%
2006	163	136	133	97.8%	3	2.2%	136	15	11.0%	119	87.5%	0	0.0%	2	1.5%	0	0.0%
2007	177	142	137	96.5%	5	3.5%	141	18	12.8%	117	83.0%	0	0.0%	5	3.5%	1	0.7%
2008	158	138	132	95.7%	6	4.3%	136	18	13.2%	117	86.0%	0	0.0%	1	0.7%	0	0.0%
2009	187	154	148	96.1%	6	3.9%	153	21	13.7%	127	83.0%	0	0.0%	4	2.6%	0	0.0%
2010	152	152	147	96.7%	5	3.3%	152	21	13.8%	127	83.6%	0	0.0%	2	1.3%	2	1.3%
2011	152	151	147	97.4%	4	2.6%	151	19	12.6%	128	84.8%	0	0.0%	3	2.0%	1	0.7%
2012	147	138	136	98.6%	2	1.4%	139	18	12.9%	118	84.9%	0	0.0%	3	2.2%	0	0.0%
2013	136	136	133	97.8%	3	2.2%	136	17	12.5%	117	86.0%	0	0.0%	1	0.7%	1	0.7%
2014	142	140	138	98.6%	2	1.4%	140	15	10.7%	124	88.6%	0	0.0%	1	0.7%	0	0.0%
2015	146	144	140	97.2%	4	2.8%	144	18	12.5%	125	86.8%	0	0.0%	1	0.7%	0	0.0%
2016	144	138	135	97.8%	3	2.2%	137	16	11.7%	121	88.3%	0	0.0%	0	0.0%	0	0.0%
2017	141	141	137	97.2%	4	2.8%	140	16	11.4%	123	87.9%	0	0.0%	1	0.7%	0	0.0%
2018	148	148	145	98.0%	3	2.0%	147	17	11.6%	129	87.8%	0	0.0%	1	0.7%	0	0.0%
2019	150	150	148	98.7%	2	1.3%	149	18	12.1%	130	87.2%	0	0.0%	1	0.7%	0	0.0%
2020	147	147	145	98.6%	2	1.4%	147	16	10.9%	129	87.8%	0	0.0%	1	0.7%	1	0.7%
2021	146	146	145	99.3%	1	0.7%	146	15	10.3%	130	89.0%	0	0.0%	1	0.7%	0	0.0%
2022	148	147	145	98.6%	2	1.4%	147	16	10.9%	130	88.4%	0	0.0%	1	0.7%	0	0.0%
2023	140	140	139	99.3%	1	0.7%	140	15	10.7%	124	88.6%	0	0.0%	1	0.7%	0	0.0%
2024	121	121	119	98.3%	2	1.7%	121	15	12.4%	106	87.6%	0	0.0%	0	0.0%	0	0.0%
Total	1588	883	678	76.8%	205	23.2%	882	160	18.1%	558	63.3%	0	0.0%	37	4.2%	125	14.2%

• Totals include every vessel from 1978 to 2024.

Participation and Earnings

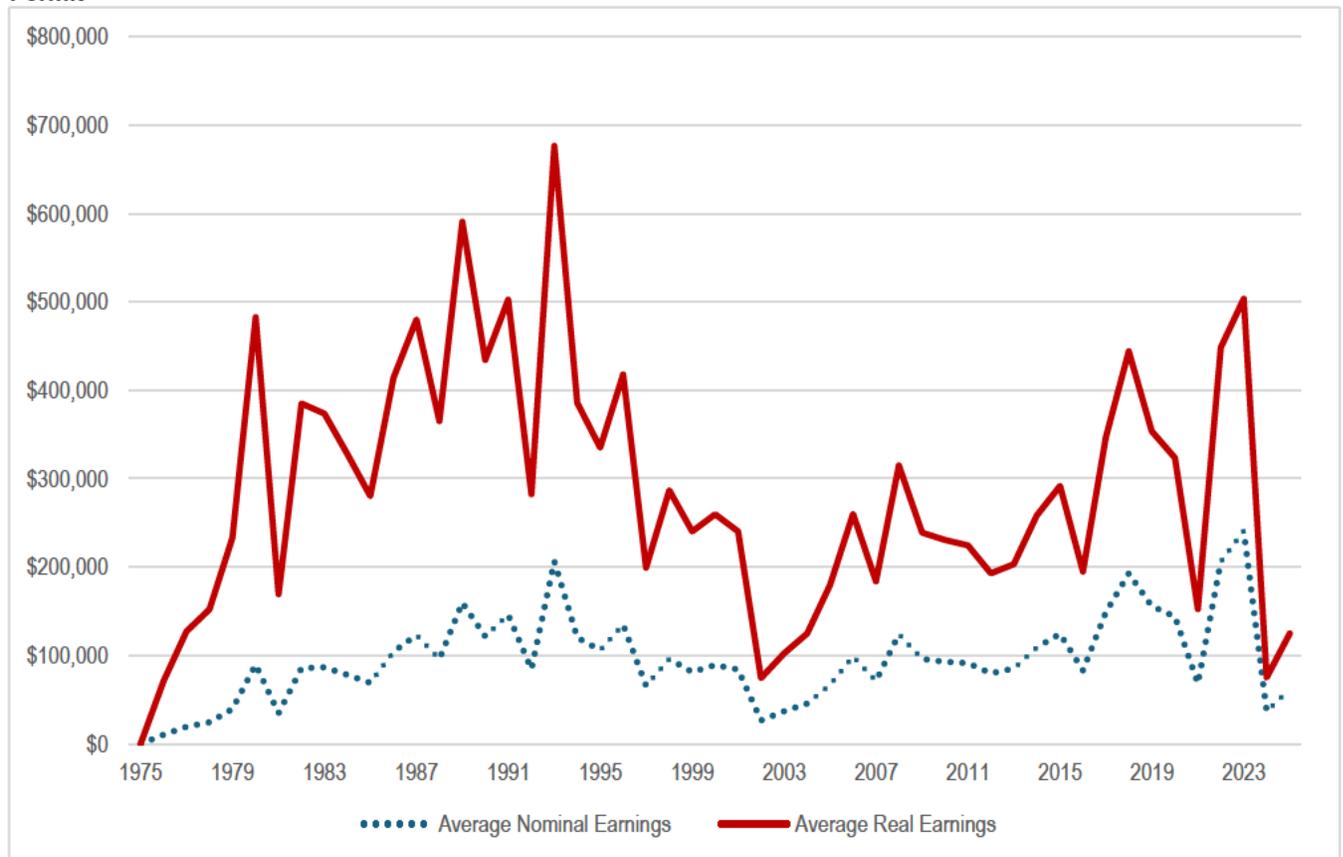
Earnings are estimated from weighted average ex-vessel prices, and as noted earlier, come primarily from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 3-4 reflect both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of 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 Alaska Peninsula Salmon drift gillnet fishery was in 2000. 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 3-11 reports the number of permits issued, and estimated gross earnings in Alaska Peninsula salmon drift gillnet fishery from 1975 to 2024. Note that the figures by permit or vessel in this table span the entire year, regardless of who held the permit or however many times the permit was transferred.

Table 3-12 reports the number of permit holders (people) and estimated real (inflation adjusted) gross earnings by each resident type.

Figure 3-4. Estimated Nominal and Real Average Gross Earnings Per Alaska Peninsula Salmon Drift Gillnet Permit



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

Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 3-11. Estimated Total Gross Earnings (Real and Nominal) for the Alaska Peninsula Salmon Drift Gillnet Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2024

Year	Permits Issued	Total Gross Earnings Nominal	Total Gross Earnings Real	Permits with Landings	Average Nominal Earnings	Average Real Earnings	Vessels with Landings	Average Real Vessel Earnings
1975	158	\$1,007,475	\$5,972,515	98	\$10,280	\$60,944	121	\$49,360
1976	154	\$2,236,007	\$12,531,926	116	\$19,276	\$108,034	121	\$103,570
1977	156	\$2,718,588	\$14,310,646	112	\$24,273	\$127,774	126	\$113,577
1978	158	\$5,265,517	\$25,752,591	133	\$39,590	\$193,629	133	\$193,629
1979	161	\$13,065,156	\$57,435,732	146	\$89,487	\$393,395	159	\$361,231
1980	163	\$5,391,196	\$20,881,182	155	\$34,782	\$134,717	193	\$108,193
1981	164	\$12,983,561	\$45,559,316	152	\$85,418	\$299,732	194	\$234,842
1982	164	\$13,543,297	\$44,766,014	156	\$86,816	\$286,962	215	\$208,214
1983	165	\$12,406,647	\$39,753,379	159	\$78,029	\$250,021	209	\$190,208
1984	165	\$10,884,162	\$33,415,464	158	\$68,887	\$211,490	180	\$185,641
1985	166	\$16,502,021	\$48,936,744	158	\$104,443	\$309,726	168	\$291,290
1986	165	\$20,149,727	\$58,613,540	164	\$122,864	\$357,400	188	\$311,774
1987	166	\$15,639,277	\$43,921,344	163	\$95,946	\$269,456	182	\$241,326
1988	164	\$25,879,056	\$69,816,517	162	\$159,747	\$430,966	186	\$375,358
1989	165	\$19,806,600	\$50,992,092	163	\$121,513	\$312,835	179	\$284,872
1990	165	\$23,653,117	\$57,763,277	162	\$146,007	\$356,563	229	\$252,241
1991	164	\$13,698,303	\$32,099,234	162	\$84,557	\$198,143	190	\$168,943
1992	164	\$33,474,056	\$76,126,697	162	\$206,630	\$469,918	180	\$422,926
1993	164	\$19,595,162	\$43,277,874	163	\$120,216	\$265,508	194	\$223,082
1994	164	\$17,423,630	\$37,507,849	164	\$106,242	\$228,706	194	\$193,339
1995	164	\$22,154,354	\$46,391,217	164	\$135,088	\$282,873	186	\$249,415
1996	164	\$10,715,841	\$21,798,165	163	\$65,741	\$133,731	193	\$112,944
1997	164	\$15,079,264	\$29,974,561	157	\$96,046	\$190,921	186	\$161,154
1998	164	\$12,934,281	\$25,318,854	159	\$81,348	\$159,238	276	\$91,735
1999	164	\$14,254,659	\$27,304,799	160	\$89,092	\$170,655	235	\$116,191
2000	161	\$13,152,436	\$24,372,779	156	\$84,310	\$156,236	230	\$105,969
2001	159	\$3,647,387	\$6,573,685	137	\$26,623	\$47,983	164	\$40,083
2002	157	\$4,143,351	\$7,350,305	112	\$36,994	\$65,628	157	\$46,817
2003	153	\$4,982,240	\$8,640,201	109	\$45,709	\$79,268	128	\$67,502
2004	151	\$7,822,966	\$13,213,771	117	\$66,863	\$112,938	141	\$93,715
2005	153	\$11,848,309	\$19,361,322	120	\$98,736	\$161,344	182	\$106,381
2006	157	\$9,037,168	\$14,306,741	127	\$71,159	\$112,652	163	\$87,771
2007	159	\$15,503,683	\$23,858,618	125	\$124,029	\$190,869	177	\$134,794
2008	160	\$12,507,586	\$18,541,245	130	\$96,212	\$142,625	158	\$117,350
2009	162	\$13,077,582	\$19,447,672	141	\$92,749	\$137,927	187	\$103,998
2010	163	\$12,951,750	\$18,951,001	142	\$91,210	\$133,458	152	\$124,678
2011	163	\$11,486,251	\$16,294,396	144	\$79,766	\$113,156	152	\$107,200
2012	163	\$11,314,497	\$15,724,888	133	\$85,071	\$118,232	147	\$106,972
2013	163	\$14,508,277	\$19,873,437	133	\$109,085	\$149,424	136	\$146,128
2014	163	\$17,041,199	\$22,971,536	137	\$124,388	\$167,675	142	\$161,771
2015	163	\$11,629,258	\$15,656,470	140	\$83,066	\$111,832	146	\$107,236
2016	162	\$20,099,417	\$26,722,175	135	\$148,885	\$197,942	144	\$185,571
2017	163	\$27,014,615	\$35,164,925	140	\$192,962	\$251,178	141	\$249,397
2018	162	\$22,895,697	\$29,095,852	147	\$155,753	\$197,931	148	\$196,594
2019	162	\$21,456,895	\$26,780,351	149	\$144,006	\$179,734	150	\$178,536
2020	162	\$10,049,234	\$12,387,691	147	\$68,362	\$84,270	147	\$84,270
2021	161	\$30,082,136	\$35,424,723	146	\$206,042	\$242,635	146	\$242,635
2022	161	\$35,423,275	\$38,625,539	147	\$240,975	\$262,759	148	\$260,983
2023	161	\$5,137,779	\$5,380,282	140	\$36,698	\$38,431	140	\$38,431
2024	161	\$7,489,895	\$7,618,721	121	\$61,900	\$62,965	121	\$62,965

- 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.

Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 3-12. Estimated Real Gross Earnings for Permit Holders in the Alaska Peninsula Salmon Drift Gillnet Fishery by Resident Type, 1975-2024

Year	Local			Nonlocal			Nonresident			Total		
	People	Average	Total	People	Average	Total	People	Average	Total	People	Average	Total
1975	67	\$46,092	\$3,088,176	4	\$80,363	\$321,452	27	\$94,922	\$2,562,887	98	\$60,944	\$5,972,515
1976	74	\$75,505	\$5,587,387	4	\$78,416	\$313,664	38	\$174,497	\$6,630,875	116	\$108,034	\$12,531,926
1977	70	\$93,294	\$6,530,600	5	\$140,132	\$700,659	38	\$186,300	\$7,079,386	113	\$126,643	\$14,310,646
1978	83	\$138,451	\$11,491,465	8	\$227,894	\$1,823,153	45	\$276,399	\$12,437,972	136	\$189,357	\$25,752,591
1979	89	\$235,129	\$20,926,504	10	\$327,693	\$3,276,930	48	\$692,340	\$33,232,298	147	\$390,719	\$57,435,732
1980	90	\$102,629	\$9,236,654	14	\$110,242	\$1,543,390	51	\$198,062	\$10,101,138	155	\$134,717	\$20,881,182
1981	86	\$210,768	\$18,126,052	14	\$306,793	\$4,295,102	55	\$420,694	\$23,138,161	155	\$293,931	\$45,559,316
1982	83	\$208,531	\$17,308,046	17	\$331,955	\$5,643,237	58	\$376,116	\$21,814,731	158	\$283,329	\$44,766,014
1983	81	\$163,006	\$13,203,468	23	\$255,388	\$5,873,916	63	\$328,190	\$20,675,995	167	\$238,044	\$39,753,379
1984	81	\$145,296	\$11,768,946	24	\$192,284	\$4,614,825	62	\$274,705	\$17,031,694	167	\$200,093	\$33,415,464
1985	72	\$230,287	\$16,580,664	26	\$263,977	\$6,863,394	64	\$398,323	\$25,492,686	162	\$302,079	\$48,936,744
1986	72	\$225,832	\$16,259,881	34	\$329,621	\$11,207,110	64	\$486,665	\$31,146,549	170	\$344,786	\$58,613,540
1987	66	\$195,173	\$12,881,393	37	\$285,500	\$10,563,488	63	\$325,023	\$20,476,463	166	\$264,586	\$43,921,344
1988	60	\$302,581	\$18,154,863	36	\$451,630	\$16,258,689	71	\$498,633	\$35,402,966	167	\$418,063	\$69,816,517
1989	60	\$225,038	\$13,502,283	36	\$347,670	\$12,516,111	68	\$367,260	\$24,973,698	164	\$310,927	\$50,992,092
1990	55	\$242,018	\$13,311,003	41	\$382,414	\$15,678,970	71	\$405,258	\$28,773,304	167	\$345,888	\$57,763,277
1991	55	\$141,950	\$7,807,235	43	\$212,320	\$9,129,776	72	\$210,586	\$15,162,223	170	\$188,819	\$32,099,234
1992	51	\$327,690	\$16,712,193	42	\$527,109	\$22,138,565	73	\$510,629	\$37,275,939	166	\$458,595	\$76,126,697
1993	51	\$183,517	\$9,359,342	45	\$284,395	\$12,797,758	72	\$293,344	\$21,120,774	168	\$257,606	\$43,277,874
1994	50	\$155,200	\$7,759,977	49	\$232,900	\$11,412,106	71	\$258,250	\$18,335,765	170	\$220,634	\$37,507,849
1995	45	\$182,836	\$8,227,612	50	\$309,137	\$15,456,871	74	\$306,848	\$22,706,735	169	\$274,504	\$46,391,217
1996	44	\$91,158	\$4,010,961	53	\$127,181	\$6,740,618	80	\$138,082	\$11,046,586	176	\$123,853	\$21,798,165
1997	39	\$124,536	\$4,856,909	52	\$183,487	\$9,541,312	76	\$204,952	\$15,576,340	167	\$179,488	\$29,974,561
1998	35	\$98,501	\$3,447,537	52	\$171,917	\$8,939,699	80	\$161,645	\$12,931,618	167	\$151,610	\$25,318,854
1999	35	\$110,154	\$3,855,377	52	\$163,508	\$8,502,437	79	\$189,202	\$14,946,985	166	\$164,487	\$27,304,799
2000	33	\$99,105	\$3,270,464	47	\$155,765	\$7,320,952	78	\$176,684	\$13,781,362	158	\$154,258	\$24,372,779
2001	32	\$38,202	\$1,222,456	36	\$40,989	\$1,475,598	69	\$56,169	\$3,875,632	137	\$47,983	\$6,573,685
2002	27	\$53,281	\$1,438,593	30	\$64,595	\$1,937,853	55	\$72,252	\$3,973,858	112	\$65,628	\$7,350,305
2003	30	\$62,703	\$1,881,076	23	\$81,074	\$1,864,701	57	\$85,867	\$4,894,424	110	\$78,547	\$8,640,201
2004	38	\$73,562	\$2,795,345	26	\$117,824	\$3,063,415	54	\$136,204	\$7,355,011	118	\$111,981	\$13,213,771
2005	41	\$97,348	\$3,991,286	27	\$166,313	\$4,490,442	56	\$194,278	\$10,879,595	124	\$156,140	\$19,361,322
2006	37	\$67,216	\$2,486,975	32	\$127,952	\$4,094,470	59	\$130,937	\$7,725,296	128	\$111,771	\$14,306,741
2007	34	\$116,781	\$3,970,569	39	\$182,420	\$7,114,392	55	\$232,248	\$12,773,658	128	\$186,395	\$23,858,618
2008	33	\$84,101	\$2,775,319	41	\$150,027	\$6,151,117	61	\$157,620	\$9,614,810	135	\$137,343	\$18,541,245
2009	35	\$98,081	\$3,432,822	46	\$139,934	\$6,436,948	64	\$149,655	\$9,577,902	145	\$134,122	\$19,447,672
2010	33	\$92,678	\$3,058,358	52	\$128,605	\$6,687,465	60	\$153,420	\$9,205,177	145	\$130,697	\$18,951,001
2011	30	\$85,814	\$2,574,423	51	\$113,969	\$5,812,437	63	\$125,516	\$7,907,536	144	\$113,156	\$16,294,396
2012	28	\$86,133	\$2,411,722	42	\$117,372	\$4,929,624	65	\$128,978	\$8,383,542	135	\$116,481	\$15,724,888
2013	30	\$121,497	\$3,644,900	41	\$143,413	\$5,879,939	62	\$166,913	\$10,348,599	133	\$149,424	\$19,873,437
2014	31	\$132,919	\$4,120,491	46	\$154,914	\$7,126,050	61	\$192,213	\$11,724,995	138	\$166,460	\$22,971,536
2015	30	\$73,148	\$2,194,437	46	\$122,539	\$5,636,801	66	\$118,564	\$7,825,232	142	\$110,257	\$15,656,470
2016	30	\$117,683	\$3,530,477	46	\$211,028	\$9,707,299	60	\$224,740	\$13,484,399	136	\$196,487	\$26,722,175
2017	28	\$167,269	\$4,683,542	51	\$271,190	\$13,830,715	63	\$264,296	\$16,650,668	142	\$247,640	\$35,164,925
2018	26	\$125,885	\$3,273,012	60	\$210,973	\$12,658,392	62	\$212,330	\$13,164,448	148	\$196,594	\$29,095,852
2019	26	\$108,341	\$2,816,871	63	\$196,875	\$12,403,150	60	\$192,672	\$11,560,330	149	\$179,734	\$26,780,351
2020	26	\$53,963	\$1,403,030	71	\$88,437	\$6,279,022	53	\$88,786	\$4,705,639	150	\$82,585	\$12,387,691
2021	28	\$141,246	\$3,954,882	68	\$240,288	\$16,339,613	53	\$285,476	\$15,130,228	149	\$237,750	\$35,424,723
2022	27	\$128,867	\$3,479,414	68	\$277,580	\$18,875,466	54	\$301,308	\$16,270,659	149	\$259,232	\$38,625,539
2023	23	\$20,379	\$468,715	67	\$39,494	\$2,646,097	51	\$44,421	\$2,265,470	141	\$38,158	\$5,380,282
2024	19	\$48,468	\$920,900	58	\$57,069	\$3,310,024	44	\$76,995	\$3,387,797	121	\$62,965	\$7,618,721

- 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.

Chapter 4 Alaska Peninsula Salmon Set Gillnet Fishery

S04M Permit Holdings

Limited entry permits for the Alaska Peninsula salmon set gillnet fishery (S04M permits) were issued starting in 1975. CFEC has issued 116 S04M permits. Table 4-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 84.5% (98/116) of the permits, Nonlocal Alaskans received 7.8% (9/116) of the permits, and Nonresidents received 7.8% (9/116). Every S04M permit issued was issued as a non-transferable permit.

Table 4-1. Initial Issuance and Year-end 2024 Totals of Alaska Peninsula Salmon Set Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

Residency	Initial Issue		Transfers		Migrations		Cancelled		2024 Year End	
	Total	Percent	Change	Percent Change	Change	Percent Change	Change	Percent Change	Total	Percent
Local	98	84.5%	15	15.3%	-36	-36.7%	-2	-2.0%	75	67.6%
Nonlocal	9	7.8%	-14	-155.6%	26	288.9%	-2	-22.2%	19	17.1%
Nonresident	9	7.8%	-1	-11.1%	10	111.1%	-1	-11.1%	17	15.3%
Total	116	100.0%	0		0		-5	-4.3%	111	100.00%

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 S04M 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.⁸ 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 4-2. Transfer Acquisition Methods for Alaska Peninsula Salmon Set Gillnet Permits, 1980-2024

Acquisition Method	Alaska Peninsula Salmon Set Gillnet		Combined Alaska Peninsula		Statewide Salmon Set Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	206	42.9%	544	37.5%	7,074	51.6%	14,341	33.0%
Sale	225	46.9%	758	52.3%	5,213	38.0%	25,299	58.2%
Trade	9	1.9%	32	2.2%	97	0.7%	541	1.2%
Other	40	8.3%	115	7.9%	1,329	9.7%	3,294	7.6%
Total	480		1,449		13,713		43,475	

Table 4-2 compares the transfer acquisition methods for the S04M permits, all statewide salmon set gillnet permits, and all limited entry permits between 1980 and 2024. Almost half of all S04M transfers were sales (46.9% or 225/480), a little less were gifts (42.9% or 206/480), and a smaller percentage were trades (1.9% or 9/480) or other (8.3% or 40/480). The annual acquisition methods for S04M permits can be viewed in a different publication.⁹

⁸ CFEC implemented the transfer survey in 1980.

⁹ See *Changes in the Distribution of Alaska’s Commercial Fisheries Entry Permits, 1975-2021*, CFEC Report No. 22-2N.

Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 4-3. Relationships of Transferor to Transfer Recipients for Alaska Peninsula Salmon Set Gillnet, 1980-2024

Relationship	Alaska Peninsula Salmon Set Gillnet		Combined Alaska Peninsula		Statewide Salmon Set Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	97	20.2%	258	17.8%	2,807	20.5%	8,189	18.8%
Member of Immediate Family	207	43.1%	571	39.4%	6,566	47.9%	14,586	33.6%
Other Relative	34	7.1%	78	5.4%	948	6.9%	1,938	4.5%
Other	142	29.6%	542	37.4%	3,392	24.7%	18,762	43.2%
Total	480		1,449		13,713		43,475	

Table 4-3 shows the relationships between the transferors and transfer recipients for S04M permits and compares S04M permit transfers with all Area M permits, 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 50.2% (241/480) of all permit transfers for S04M permits compared to 55.0% (7,514/13,713) for all salmon set gillnet permits statewide, and 38.0% (16,524/43,475) for all limited entry permits statewide.

Emergency Transfers of S04M 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 on permanent permits 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.

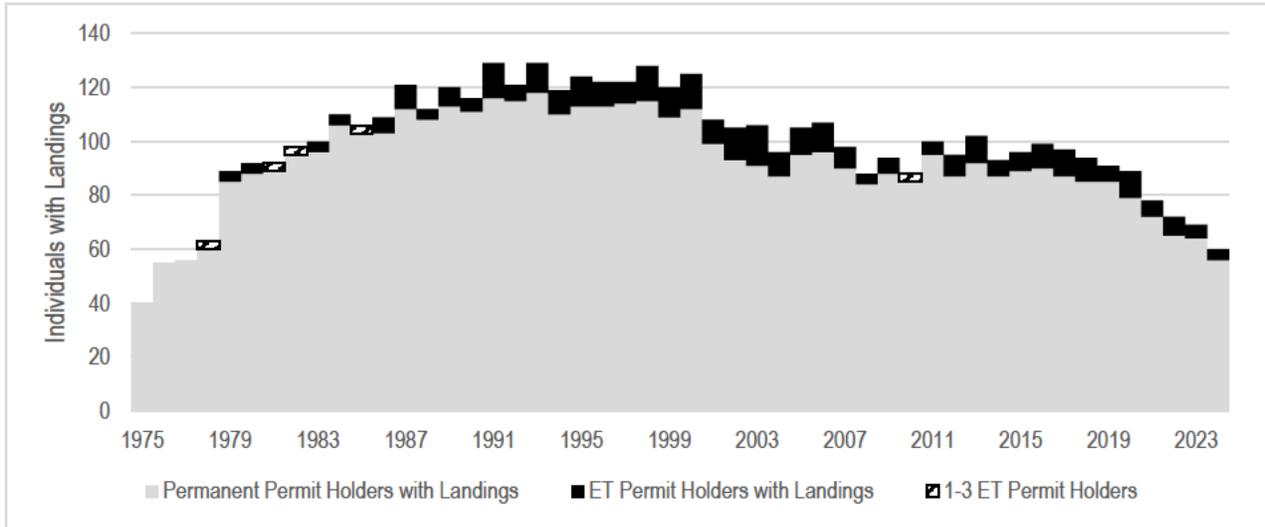
Table 4-4 and Figure 4-1 show the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. Some individuals who made landings with ET permits also made landings with permanent permits in the same year.

Table 4-4. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Set Gillnet Fishery, 1975-2024

Individuals With Landings				ET Permit Holders With Landings				ET Permit Holders With Landings			
Year	Landings	ET Permit Holders With Landings	ET Rate	Year	Landings	ET Permit Holders With Landings	ET Rate	Year	Landings	ET Permit Holders With Landings	ET Rate
1975	40	0	0.0%	1992	115	6	5.2%	2009	88	6	6.8%
1976	55	0	0.0%	1993	118	11	9.3%	2010	85	1 to 3	-
1977	56	0	0.0%	1994	110	9	8.2%	2011	95	5	5.3%
1978	60	1 to 3	-	1995	113	11	9.7%	2012	87	8	9.2%
1979	85	4	4.7%	1996	113	9	8.0%	2013	92	10	10.9%
1980	88	4	4.5%	1997	114	8	7.0%	2014	87	6	6.9%
1981	89	1 to 3	-	1998	115	13	11.3%	2015	89	7	7.9%
1982	95	1 to 3	-	1999	109	11	10.1%	2016	90	9	10.0%
1983	96	4	4.2%	2000	112	13	11.6%	2017	87	10	11.5%
1984	106	4	3.8%	2001	99	9	9.1%	2018	85	9	10.6%
1985	103	1 to 3	-	2002	93	12	12.9%	2019	85	6	7.1%
1986	103	6	5.8%	2003	91	15	16.5%	2020	79	10	12.7%
1987	112	9	8.0%	2004	87	9	10.3%	2021	72	6	8.3%
1988	108	4	3.7%	2005	95	10	10.5%	2022	65	7	10.8%
1989	113	7	6.2%	2006	96	11	11.5%	2023	64	5	7.8%
1990	111	5	4.5%	2007	90	8	8.9%	2024	56	4	7.1%
1991	116	13	11.2%	2008	84	4	4.8%				

• When fewer than four individuals make landings, figures are masked due to confidentiality.

Figure 4-1. Use of Emergency Transfer Permits in the Alaska Peninsula Salmon Set Gillnet Fishery, 1975-2024



• When fewer than four individuals make landings, figures are masked due to confidentiality.

DNR Shore Fishery Leases in the Alaska Peninsula 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 Alaska Peninsula. 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 to fish.

In Alaska Peninsula, the DNR shore fishery lease program allows a permit holder to maintain up to two tracts per permit.¹⁰ While some tracts are adjacent to one another, other tracts may be scattered miles apart. Additional information regarding DNR shore fishery leases can be found in CFEC publication 19-3N.¹¹

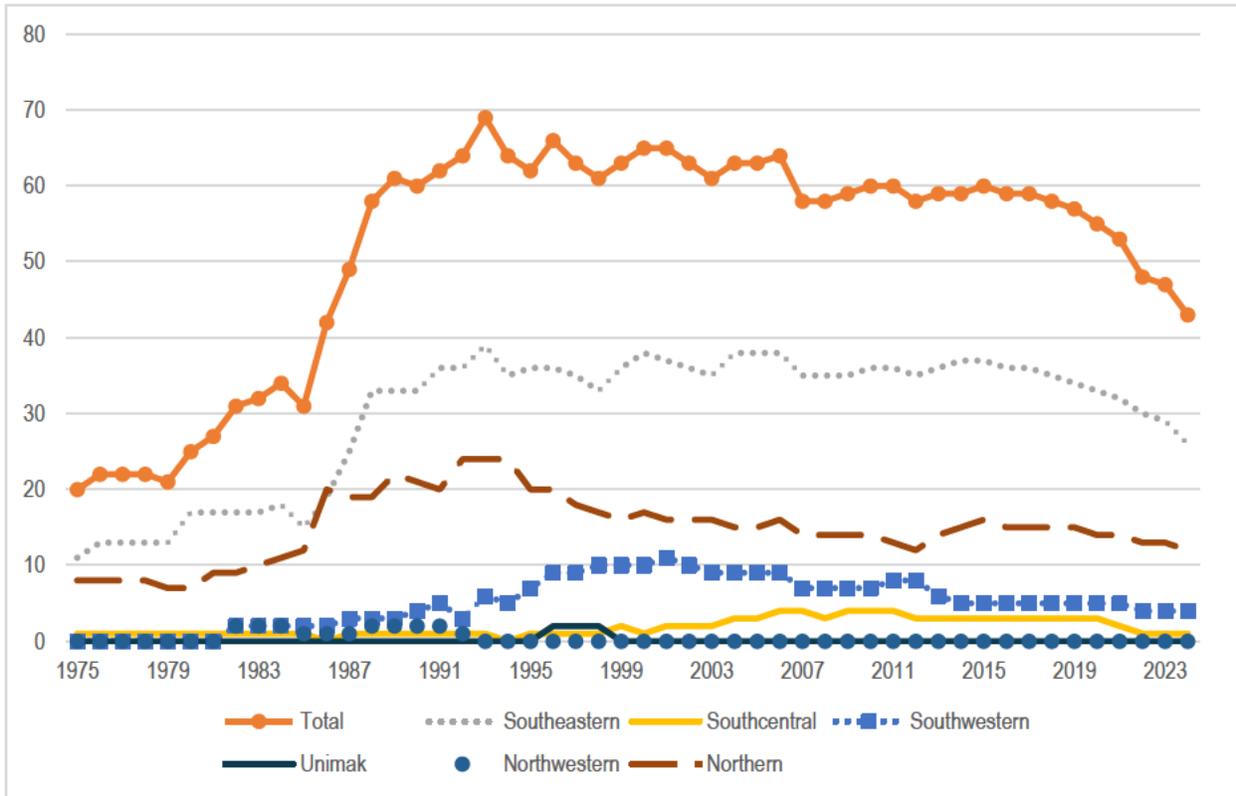
In Table 4-5, the total number of Alaska Peninsula set gillnet permits, permits with landings, and permits with a DNR shore fishery lease as of December 31 is reported by district. The total permits by district include permits that either had landings documented within the fishing district or had a DNR lease. While there are no restrictions as to which district an S04M permit can be used for fishing, most S04M permit holders did not make landings in more than one district. The counts of permits with DNR shore fishery leases are depicted by district in Figure 4-2.

¹⁰ See 11 AAC 24.0331(b)(1)(D).

¹¹ See *CFEC Salmon Set Gillnet Permits and DNR Shore Fishery Lease in Prince William Sound, Cook Inlet, Kodiak, Alaska Peninsula, and Bristol Bay 1975 – 2018*. CFEC Report No 19-3N.

Alaska Peninsula Salmon Drift Gillnet (S03M)

Figure 4-2. Count of Permits with DNR Shore Fishery Leases by District on the Alaska Peninsula, 1975-2024



Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 4-5. Alaska Peninsula Salmon Set Gillnet DNR Shore Fishery Leases by District

Year	Total Permits	Southeastern		Southcentral		Southwestern		Unimak		Northwestern		Northern			
		Permits with a DNR Lease	Permits with Landings	Permits with a DNR Lease	Permits with Landings	Permits with a DNR Lease	Permits with Landings	Permits with a DNR Lease	Permits with Landings	Permits with a DNR Lease	Permits with Landings	Permits with a DNR Lease	Permits with Landings		
1975	106	20	40	11	17	1	2	0	1	0	0	0	0	8	29
1976	114	22	53	13	22	1	12	0	3	0	0	0	0	8	29
1977	108	22	56	13	24	1	14	0	2	0	0	0	1	8	31
1978	113	22	60	13	27	1	18	0	5	0	0	0	1	8	30
1979	113	21	80	13	33	1	24	0	5	0	0	0	4	7	39
1980	114	25	86	17	34	1	28	0	7	0	0	0	3	7	42
1981	115	27	88	17	40	1	30	0	13	0	0	0	3	9	37
1982	115	31	92	17	44	1	32	2	11	0	0	2	4	9	40
1983	114	32	94	17	46	1	35	2	12	0	0	2	5	10	41
1984	113	34	103	18	53	1	44	2	6	0	0	2	6	11	38
1985	114	31	102	15	54	1	33	2	10	0	0	1	9	12	40
1986	114	42	100	19	48	0	33	2	10	0	0	1	9	20	45
1987	114	49	108	25	58	1	40	3	12	0	0	1	7	19	41
1988	114	58	106	33	60	1	36	3	11	0	0	2	8	19	40
1989	114	61	111	33	63	1	38	3	27	0	0	2	10	22	38
1990	114	60	110	33	65	1	48	4	19	0	0	2	9	21	38
1991	114	62	110	36	66	1	7	5	16	0	5	2	7	20	36
1992	114	64	111	36	63	1	10	3	29	0	4	1	9	24	47
1993	114	69	113	39	67	1	7	6	24	0	12	0	9	24	43
1994	114	64	108	35	63	0	9	5	26	0	7	0	6	24	41
1995	114	62	109	36	63	1	25	7	24	0	6	0	3	20	38
1996	114	66	109	36	70	1	14	9	19	2	6	0	3	20	40
1997	114	63	111	35	65	1	16	9	31	2	4	0	4	18	38
1998	113	61	112	33	71	1	18	10	27	2	4	0	6	17	33
1999	113	63	107	36	72	2	30	10	25	0	6	0	5	16	32
2000	113	65	109	38	72	1	21	10	30	0	5	0	6	17	32
2001	113	65	98	37	67	2	5	11	18	0	0	0	3	16	27
2002	113	63	90	36	60	2	3	10	20	0	2	0	1	16	27
2003	113	61	86	35	57	2	5	9	16	0	1	0	1	16	28
2004	113	63	86	38	55	3	16	9	16	0	1	0	0	15	28
2005	113	63	92	38	61	3	17	9	19	0	0	0	3	15	28
2006	114	64	94	38	60	4	27	9	18	0	2	0	1	16	26
2007	114	58	88	35	60	4	25	7	20	0	1	0	1	14	26
2008	113	58	83	35	58	3	10	7	21	0	2	0	0	14	27
2009	113	59	88	35	56	4	20	7	16	0	1	0	0	14	24
2010	113	60	84	36	59	4	14	7	17	0	1	0	2	14	23
2011	113	60	93	36	59	4	12	8	18	0	3	0	1	13	25
2012	113	58	87	35	60	3	14	8	18	0	1	0	0	12	22
2013	113	59	90	36	55	3	14	6	19	0	9	0	0	14	25
2014	113	59	86	37	53	3	22	5	23	0	1	0	1	15	23
2015	112	60	89	37	56	3	22	5	19	0	0	0	0	16	24
2016	111	59	87	36	57	3	21	5	19	0	0	0	0	15	22
2017	111	59	87	36	60	3	25	5	24	0	4	0	0	15	22
2018	111	58	85	35	59	3	10	5	17	0	2	0	1	15	25
2019	111	57	85	34	55	3	23	5	21	0	0	0	1	15	24
2020	111	55	77	33	54	3	11	5	15	0	0	0	2	14	21
2021	111	53	72	32	57	2	16	5	16	0	0	0	1	14	21
2022	111	48	65	30	49	1	7	4	10	0	0	0	0	13	20
2023	111	47	64	29	48	1	6	4	13	0	0	0	0	13	21
2024	111	43	56	26	43	1	3	4	12	0	0	0	1	12	20

Latent S04M Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they fish. Permits that are not used (do not 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 legal,¹² it allegedly occurs in the set gillnet fisheries at a rate higher than in other fisheries. The effect would be to under-count the number of permits active in the fishery, and over-estimate the latency rate.

Individuals who hold a DNR Shore Fishery Lease are required by regulation to fish at least four openings in years when they hold a lease; individuals may choose to refrain for no more than one year from using the site and still retain rights.¹³ The ‘Permits Fished and/or DNR Lease’ column counts permits that either held a DNR Shore Fishery Lease or made a commercial landing. The actual annual rate of latency likely lies between the rates given in this table.

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 4-6. Alaska Peninsula Salmon Set Gillnet Permit Latency, 1975-2024

Year	Total Fishery Permits	Permits with Landings	Latency Rate	Year	Total Fishery Permits	Permits with Landings	Latency Rate	Year	Total Fishery Permits	Permits with Landings	Latency Rate
1975	106	40	62.3%	1992	114	111	2.6%	2009	113	88	22.1%
1976	114	53	53.5%	1993	114	113	0.9%	2010	113	84	25.7%
1977	108	56	48.1%	1994	114	108	5.3%	2011	113	93	17.7%
1978	113	60	46.9%	1995	114	109	4.4%	2012	113	87	23.0%
1979	113	80	29.2%	1996	114	109	4.4%	2013	113	90	20.4%
1980	113	86	23.9%	1997	114	111	2.6%	2014	113	86	23.9%
1981	115	88	23.5%	1998	113	112	0.9%	2015	112	89	20.5%
1982	115	92	20.0%	1999	113	107	5.3%	2016	111	87	21.6%
1983	114	94	17.5%	2000	113	109	3.5%	2017	111	87	21.6%
1984	113	103	8.8%	2001	113	98	13.3%	2018	111	85	23.4%
1985	113	102	9.7%	2002	113	90	20.4%	2019	111	85	23.4%
1986	114	100	12.3%	2003	111	86	22.5%	2020	111	77	30.6%
1987	114	108	5.3%	2004	111	86	22.5%	2021	111	72	35.1%
1988	114	106	7.0%	2005	113	92	18.6%	2022	111	65	41.4%
1989	114	111	2.6%	2006	114	94	17.5%	2023	110	64	41.8%
1990	114	110	3.5%	2007	114	88	22.8%	2024	110	56	49.1%
1991	114	110	3.5%	2008	113	83	26.5%				

- 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.
- When fewer than four individuals make landings, figures are masked due to confidentiality.

¹² See AS 16.05.680 (b) and AS 16.05.690 (b).

¹³ See 11 AAC 64.180.

New Entrants into the Alaska Peninsula Salmon Set Gillnet Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S04M 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.

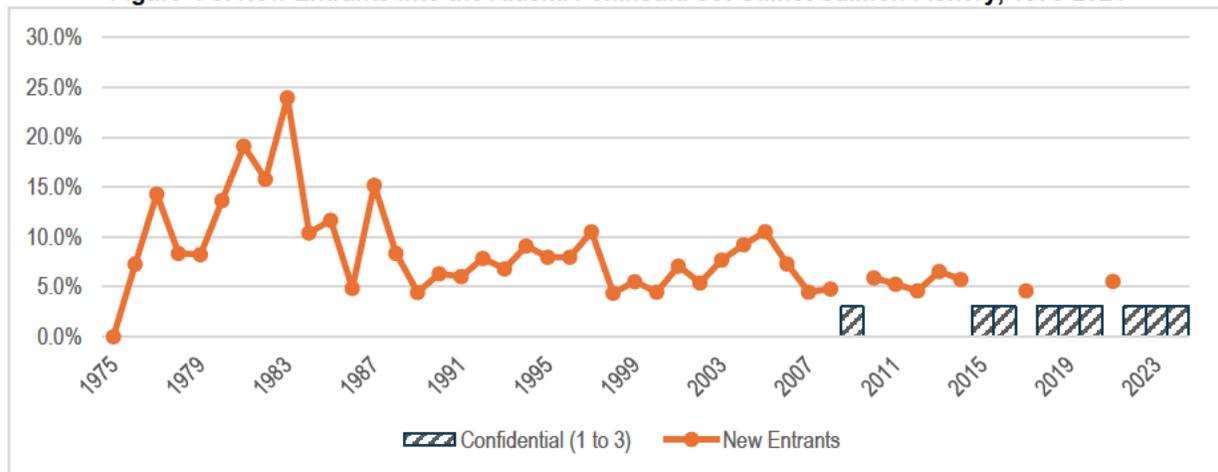
Table 4-7 and Figure 4-3 describe individuals rather than permits. An individual may hold up to two permits in this fishery, but can only fish one of them. An individual may hold one S04M permit one year, and then in subsequent years hold a different S04M permit. Likewise, individuals may enter and exit 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 4-7. New Entrants into the Alaska Peninsula Salmon Set Gillnet Fishery, 1975-2024

Individuals New Entrants w/				Individuals New Entrants w/				Individuals New Entrants w/				Individuals New Entrants w/			
Year	Landings	Count	Percent	Year	Landings	Count	Percent	Year	Landings	Count	Percent	Year	Landings	Count	Percent
1975	40	0	0.0%	1988	108	9	8.3%	2001	99	7	7.1%	2014	87	5	5.7%
1976	55	4	7.3%	1989	113	5	4.4%	2002	93	5	5.4%	2015	89	1 to 3	-
1977	56	8	14.3%	1990	111	7	6.3%	2003	91	7	7.7%	2016	90	1 to 3	-
1978	60	5	8.3%	1991	116	7	6.0%	2004	87	8	9.2%	2017	87	4	4.6%
1979	85	7	8.2%	1992	115	9	7.8%	2005	95	10	10.5%	2018	85	1 to 3	-
1980	88	12	13.6%	1993	118	8	6.8%	2006	96	7	7.3%	2019	85	1 to 3	-
1981	89	17	19.1%	1994	110	10	9.1%	2007	90	4	4.4%	2020	79	1 to 3	-
1982	95	15	15.8%	1995	113	9	8.0%	2008	84	4	4.8%	2021	72	4	5.6%
1983	96	23	24.0%	1996	113	9	8.0%	2009	88	1 to 3	-	2022	65	1 to 3	-
1984	106	11	10.4%	1997	114	12	10.5%	2010	85	5	5.9%	2023	64	1 to 3	-
1985	103	12	11.7%	1998	115	5	4.3%	2011	95	5	5.3%	2024	56	1 to 3	-
1986	103	5	4.9%	1999	109	6	5.5%	2012	87	4	4.6%				
1987	112	17	15.2%	2000	112	5	4.5%	2013	92	6	6.5%				

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

Figure 4-3. New Entrants into the Alaska Peninsula Set Gillnet Salmon Fishery, 1975-2024



Age of S04M Permit Holders

Table 4-8. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	Combined Alaska Peninsula		Statewide Salmon Set Gillnet	Statewide All Permits	Median AK Worker Age
	S04M	Peninsula	Gillnet	Permits	Age
1980	39.9	38.0	35.8	39.4	26.0
1981	37.2	37.3	36.0	39.4	26.4
1982	37.8	37.3	36.0	39.3	26.8
1983	35.3	36.1	35.7	39.4	27.1
1984	35.0	36.4	35.8	39.7	27.3
1985	35.2	36.8	36.3	40.0	27.5
1986	37.0	37.5	36.7	40.0	27.8
1987	35.3	38.0	37.0	40.3	28.2
1988	36.3	37.8	37.3	40.5	28.6
1989	37.3	38.3	38.0	40.9	29.0
1990	37.7	38.8	38.3	41.3	29.3
1991	38.0	39.1	38.9	41.8	29.7
1992	38.6	39.6	39.3	42.3	30.1
1993	39.8	41.0	39.9	42.8	30.5
1994	41.0	41.8	40.4	43.3	30.8
1995	42.0	42.5	41.0	43.7	31.1
1996	42.6	43.0	41.7	44.3	31.5
1997	43.5	43.8	42.0	44.9	31.8
1998	44.5	44.6	42.6	45.3	32.1
1999	45.0	45.5	43.1	45.9	32.3
2000	45.0	45.9	43.4	46.3	32.4
2001	45.7	46.7	44.1	46.8	32.7
2002	46.7	47.5	44.8	47.5	33.0
2003	47.1	48.5	45.5	48.1	33.2
2004	47.1	49.0	45.8	48.6	33.4
2005	47.2	48.3	46.0	49.0	33.6
2006	47.0	48.6	46.3	49.4	33.8
2007	47.2	49.3	46.8	49.8	33.9
2008	46.6	49.8	46.8	50.2	33.9
2009	47.3	50.6	47.2	50.6	33.9
2010	48.9	50.6	47.6	51.0	33.8
2011	49.8	51.3	48.1	51.3	33.9
2012	50.2	52.1	48.7	51.7	33.9
2013	50.3	52.3	48.8	51.8	34.0
2014	50.9	52.1	49.0	52.2	34.2
2015	51.6	53.1	49.4	52.6	34.4
2016	52.5	53.4	49.7	53.1	34.6
2017	53.4	54.2	50.0	53.6	34.8
2018	54.4	54.0	50.2	53.9	35.1
2019	54.6	54.2	50.4	54.0	35.4
2020	55.5	54.7	50.8	54.3	35.6
2021	56.2	55.3	50.9	54.6	36.0
2022	56.6	54.3	51.0	54.7	36.4
2023	56.0	54.7	51.5	55.0	36.5
2024	56.6	55.1	52.0	55.3	36.9

Table 4-7 shows the annual median age of four different cohorts of people: 1) Alaska Peninsula salmon set gillnet (S04M) permit holders; 2) combined Alaska Peninsula permits; 3) all salmon set gillnet permit holders statewide; 4) all CFEC limited entry permit holders; and 5) the Alaskan working 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 mean age of the general Alaskan working age population has increased 10.9 years between 1980 and 2024. The change in ages over the same period for all CFEC permit holders was 15.9 years, and 16.2 years for the statewide set gillnet permit holders.

For S04M permit holders, the median age increased 16.7 years.

- Mean AK Working Age is the annual average age of all Alaskans age 16-64 as reported by the Alaska Department of Labor and Workforce Development, Research and Analysis Section.
- Age data from the CFEC permit file is as of December 31st of each year.

*Alaska Peninsula Salmon Drift Gillnet (S03M)***S04M Permit Value**

Many permit transfers are non-monetary transactions (see Table 4-2). Table 4-9 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 4-9. CFEC Estimated Value of Alaska Peninsula Salmon Set Gillnet Permits

Year	S04M Permit Sales	Nominal Permit Value	Real Permit Value	Real Standard Deviation
1987	8	\$61,100	\$166,800	\$7,800
1988	1	\$79,300	\$226,200	\$56,600
1989	1	\$80,000	\$215,300	\$64,400
1990	2	\$112,500	\$293,100	\$68,900
1991	2	\$147,500	\$342,800	\$29,100
1992	6	\$101,400	\$224,400	\$29,400
1993	7	\$124,400	\$267,200	\$40,700
1994	2	\$107,900	\$227,600	\$50,200
1995	10	\$109,200	\$222,500	\$23,500
1996	2	\$106,200	\$210,500	\$15,000
1997	7	\$94,400	\$182,500	\$22,900
1998	4	\$78,800	\$149,900	\$14,100
1999	2	\$86,200	\$162,200	\$24,400
2000	4	\$88,800	\$160,100	\$6,400
2001	0	\$67,900	\$116,000	\$35,700
2002	2	\$54,500	\$94,700	\$37,000
2003	2	\$47,400	\$81,100	\$25,300
2004	1	\$43,100	\$68,900	\$15,600
2005	8	\$50,500	\$80,300	\$12,700
2006	5	\$56,800	\$87,500	\$6,200
2007	1	\$57,400	\$88,500	\$6,600
2008	3	\$51,200	\$73,900	\$9,400
2009	1	\$51,200	\$74,600	\$10,000
2010	6	\$49,600	\$70,600	\$7,200
2011	5	\$54,000	\$74,500	\$5,200
2012	0	\$55,000	\$75,100	\$800
2013	3	\$55,600	\$74,400	\$3,800
2014	0	\$55,600	\$74,400	\$3,800
2015	2	\$55,600	\$74,400	\$3,400
2016	2	\$56,500	\$73,800	\$3,100
2017	4	\$56,800	\$71,900	\$1,700
2018	1	\$55,800	\$69,500	\$2,600
2019	1	\$56,400	\$70,200	\$2,200
2020	0	\$56,400	\$70,200	\$2,200
2021	3	\$54,900	\$62,800	\$7,000
2022	2	\$49,200	\$50,900	\$11,500
2023	2	\$47,400	\$49,100	\$7,200
2024	1	\$45,900	\$48,200	\$8,000

- Permit values represent averages of all arms-length sale transactions over the year.
- Real permit values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

Participation and Earnings

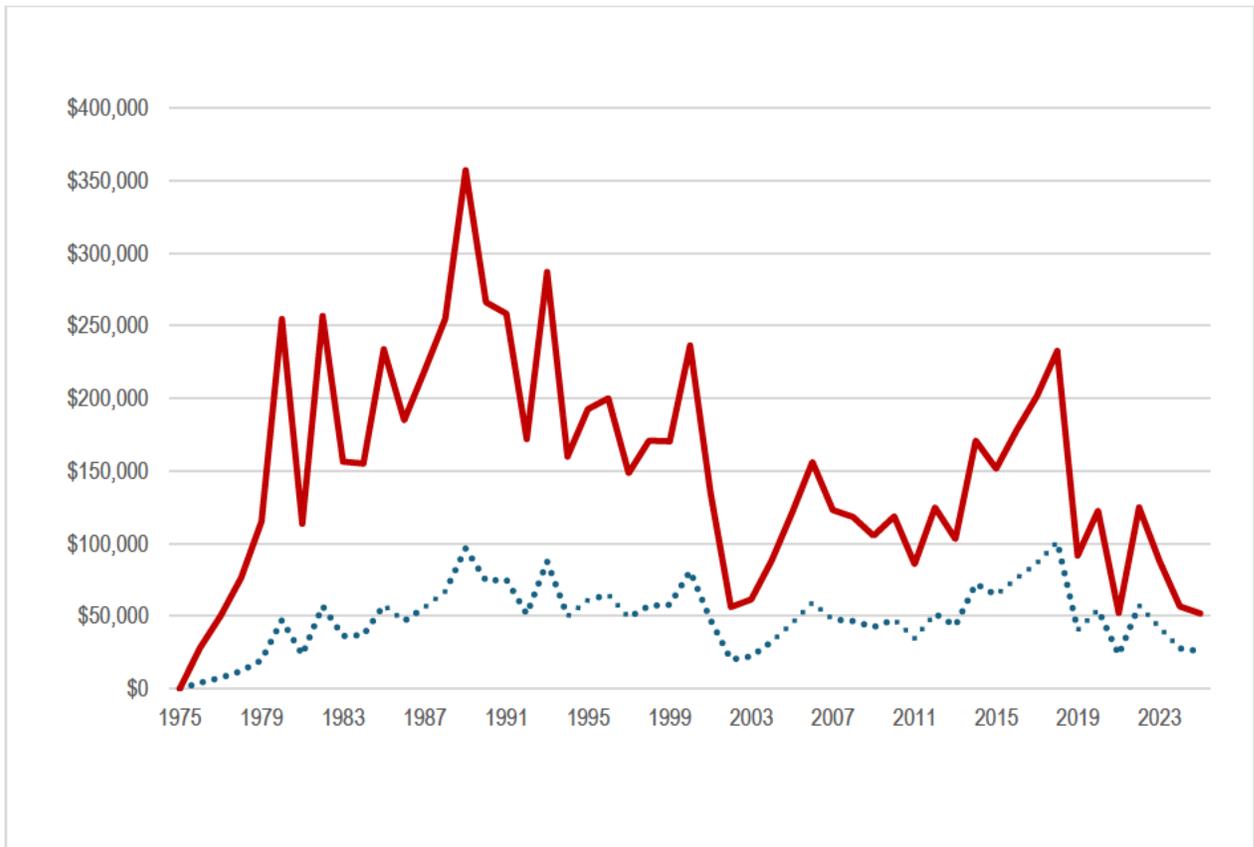
Earnings are estimated from weighted average ex-vessel prices, and as noted earlier, come primarily from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 4-4 reflect both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of 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 Alaska Peninsula salmon set gillnet fishery was in 1997. 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 4-10 reports the number of permits issued and estimated gross earnings in the Alaska Peninsula salmon set gillnet fishery from 1975 to 2024. Note that the figures by permit or vessel in this table span the entire year, regardless of who held the permit or however many times the permit was transferred.

Table 4-11 reports the number of permit holders (people) and estimated real (inflation adjusted) gross earnings by each resident type.

Figure 4-4. Estimated Nominal and Real Average Gross Earnings Per Alaska Peninsula Salmon Set Gillnet Permit



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

*Alaska Peninsula Salmon Drift Gillnet (S03M)***Table 4-10. Estimated Total Gross Earnings (Real and Nominal) for Alaska Peninsula Salmon Set Gillnet Fishery, With Average Gross (Real) Earnings by Permit, 1975-2024**

Year	Permits Issued	Total Gross Earnings		Permits With Landings	Average Nominal Earnings	Average Real Earnings
		Nominal	Real			
1975	106	\$161,999	\$960,364	40	\$4,050	\$24,009
1976	114	\$402,633	\$2,256,599	53	\$7,597	\$42,577
1977	108	\$681,939	\$3,589,726	56	\$12,177	\$64,102
1978	113	\$1,172,437	\$5,734,155	60	\$19,541	\$95,569
1979	113	\$3,774,069	\$16,591,186	80	\$47,176	\$207,390
1980	113	\$2,007,417	\$7,775,128	86	\$23,342	\$90,408
1981	115	\$5,011,217	\$17,584,360	88	\$56,946	\$199,822
1982	115	\$3,341,823	\$11,046,062	92	\$36,324	\$120,066
1983	114	\$3,464,938	\$11,102,355	94	\$36,861	\$118,110
1984	113	\$5,918,493	\$18,170,367	103	\$57,461	\$176,411
1985	113	\$4,754,871	\$14,100,571	102	\$46,616	\$138,241
1986	114	\$5,602,877	\$16,298,209	100	\$56,029	\$162,982
1987	114	\$7,228,633	\$20,300,893	108	\$66,932	\$187,971
1988	114	\$10,237,756	\$27,619,418	106	\$96,583	\$260,561
1989	114	\$8,270,160	\$21,291,528	111	\$74,506	\$191,816
1990	114	\$8,256,037	\$20,162,068	110	\$75,055	\$183,292
1991	114	\$5,657,561	\$13,257,362	110	\$51,432	\$120,521
1992	114	\$9,728,766	\$22,125,159	111	\$87,647	\$199,326
1993	114	\$5,632,529	\$12,440,004	113	\$49,845	\$110,089
1994	114	\$6,595,484	\$14,198,099	108	\$61,069	\$131,464
1995	114	\$7,048,492	\$14,759,543	109	\$64,665	\$135,409
1996	114	\$5,332,019	\$10,846,393	109	\$48,918	\$99,508
1997	114	\$6,347,383	\$12,617,327	111	\$57,184	\$113,670
1998	113	\$6,457,583	\$12,640,718	112	\$57,657	\$112,864
1999	113	\$8,675,911	\$16,618,708	107	\$81,083	\$155,315
2000	113	\$5,160,633	\$9,563,168	109	\$47,345	\$87,735
2001	113	\$1,962,668	\$3,537,316	98	\$20,027	\$36,095
2002	113	\$1,994,200	\$3,537,711	90	\$22,158	\$39,308
2003	111	\$2,775,089	\$4,812,560	86	\$32,268	\$55,960
2004	111	\$3,872,710	\$6,541,394	86	\$45,032	\$76,063
2005	113	\$5,450,949	\$8,907,395	92	\$59,249	\$96,820
2006	114	\$4,475,089	\$7,084,513	94	\$47,607	\$75,367
2007	114	\$4,100,182	\$6,309,771	88	\$46,593	\$71,702
2008	113	\$3,518,911	\$5,216,434	83	\$42,397	\$62,849
2009	113	\$4,202,288	\$6,249,222	88	\$47,753	\$71,014
2010	113	\$2,924,358	\$4,278,921	84	\$34,814	\$50,940
2011	113	\$4,801,415	\$6,811,288	93	\$51,628	\$73,240
2012	113	\$3,755,655	\$5,219,610	87	\$43,168	\$59,996
2013	113	\$6,490,025	\$8,890,037	90	\$72,111	\$98,778
2014	113	\$5,551,202	\$7,483,020	86	\$64,549	\$87,012
2015	112	\$6,749,979	\$9,087,497	89	\$75,842	\$102,107
2016	111	\$7,524,497	\$10,003,819	87	\$86,488	\$114,986
2017	111	\$8,796,484	\$11,450,384	87	\$101,109	\$131,614
2018	111	\$3,430,376	\$4,359,322	85	\$40,357	\$51,286
2019	111	\$4,633,226	\$5,782,730	85	\$54,509	\$68,032
2020	111	\$1,799,176	\$2,217,845	77	\$23,366	\$28,803
2021	111	\$4,126,719	\$4,859,625	72	\$57,316	\$67,495
2022	111	\$2,738,710	\$2,986,290	65	\$42,134	\$45,943
2023	110	\$1,769,391	\$1,852,906	64	\$27,647	\$28,952
2024	110	\$1,439,865	\$1,464,631	56	\$25,712	\$26,154

- 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.
 - When fewer than four individuals make landings, values are masked due to confidentiality.

Alaska Peninsula Salmon Drift Gillnet (S03M)

Table 4-11. Estimated Real Gross Earnings for Permit Holders in the Alaska Peninsula Salmon Set Gillnet Fishery by Resident Type, 1975-2024

Year	Local			Nonlocal			Nonresident			Total		
	People	Average	Total	People	Average	Total	People	Average	Total	People	Average	Total
1975	35	\$23,250	\$813,747	1 to 3	Confidential	Confidential	1 to 3	Confidential	Confidential	40	\$24,009	\$960,364
1976	50	\$38,769	\$1,938,474	1 to 3	Confidential	Confidential	1 to 3	Confidential	Confidential	55	\$41,029	\$2,256,599
1977	49	\$53,899	\$2,641,040	1 to 3	Confidential	Confidential	Confidential	Confidential	Confidential	56	\$64,102	\$3,589,726
1978	51	\$71,233	\$3,632,866	5	\$265,858	\$1,329,288	4	\$193,000	\$772,000	60	\$95,569	\$5,734,155
1979	72	\$170,815	\$12,298,694	7	\$432,843	\$3,029,903	6	\$210,432	\$1,262,589	85	\$195,190	\$16,591,186
1980	69	\$77,120	\$5,321,258	12	\$137,843	\$1,654,120	7	\$114,250	\$799,750	88	\$88,354	\$7,775,128
1981	69	\$164,768	\$11,368,990	13	\$299,912	\$3,898,852	7	\$330,931	\$2,316,518	89	\$197,577	\$17,584,360
1982	69	\$90,960	\$6,276,240	16	\$189,344	\$3,029,511	10	\$174,031	\$1,740,311	95	\$116,274	\$11,046,062
1983	72	\$118,062	\$8,500,496	13	\$67,989	\$883,859	11	\$156,182	\$1,718,001	96	\$115,650	\$11,102,355
1984	81	\$170,871	\$13,840,547	14	\$144,282	\$2,019,950	11	\$209,988	\$2,309,869	106	\$171,419	\$18,170,367
1985	68	\$124,886	\$8,492,262	20	\$139,480	\$2,789,605	15	\$187,914	\$2,818,704	103	\$136,899	\$14,100,571
1986	68	\$163,257	\$11,101,473	15	\$136,920	\$2,053,798	20	\$157,147	\$3,142,938	103	\$158,235	\$16,298,209
1987	70	\$193,707	\$13,559,464	22	\$172,833	\$3,802,324	20	\$146,955	\$2,939,105	112	\$181,258	\$20,300,893
1988	70	\$246,553	\$17,258,699	17	\$231,498	\$3,935,471	21	\$305,964	\$6,425,248	108	\$255,735	\$27,619,418
1989	77	\$185,999	\$14,321,908	18	\$173,068	\$3,115,220	18	\$214,133	\$3,854,399	113	\$188,421	\$21,291,528
1990	76	\$176,230	\$13,393,492	16	\$166,421	\$2,662,728	19	\$216,097	\$4,105,848	111	\$181,640	\$20,162,068
1991	77	\$108,772	\$8,375,440	18	\$130,606	\$2,350,906	21	\$120,525	\$2,531,016	116	\$114,288	\$13,257,362
1992	79	\$178,539	\$14,104,586	16	\$240,306	\$3,844,895	20	\$208,784	\$4,175,678	115	\$192,393	\$22,125,159
1993	82	\$102,271	\$8,386,232	16	\$111,217	\$1,779,480	20	\$113,715	\$2,274,292	118	\$105,424	\$12,440,004
1994	77	\$123,494	\$9,509,015	12	\$169,584	\$2,035,002	21	\$126,385	\$2,654,081	110	\$129,074	\$14,198,099
1995	74	\$132,015	\$9,769,086	14	\$150,932	\$2,113,048	25	\$115,096	\$2,877,409	113	\$130,615	\$14,759,543
1996	78	\$88,247	\$6,883,292	12	\$96,877	\$1,162,529	23	\$121,764	\$2,800,573	113	\$95,986	\$10,846,393
1997	76	\$106,665	\$8,106,569	13	\$123,177	\$1,601,302	25	\$116,378	\$2,909,456	114	\$110,678	\$12,617,327
1998	77	\$112,404	\$8,655,123	14	\$118,979	\$1,665,710	24	\$96,662	\$2,319,885	115	\$109,919	\$12,640,718
1999	71	\$156,155	\$11,086,994	20	\$150,288	\$3,005,759	18	\$140,331	\$2,525,955	109	\$152,465	\$16,618,708
2000	74	\$87,587	\$6,481,459	18	\$84,389	\$1,518,995	20	\$78,136	\$1,562,714	112	\$85,385	\$9,563,168
2001	65	\$36,863	\$2,396,071	16	\$28,857	\$461,707	18	\$37,752	\$679,537	99	\$35,730	\$3,537,316
2002	65	\$38,792	\$2,521,469	14	\$36,100	\$505,397	14	\$36,489	\$510,845	93	\$38,040	\$3,537,711
2003	62	\$54,700	\$3,391,415	17	\$43,088	\$732,502	12	\$57,387	\$688,643	91	\$52,885	\$4,812,560
2004	63	\$70,903	\$4,466,881	13	\$71,934	\$935,142	11	\$103,579	\$1,139,370	87	\$75,188	\$6,541,394
2005	64	\$101,314	\$6,484,076	17	\$75,684	\$1,286,629	14	\$81,192	\$1,136,690	95	\$93,762	\$8,907,395
2006	65	\$80,724	\$5,247,068	17	\$54,981	\$934,671	14	\$64,484	\$902,774	96	\$73,797	\$7,084,513
2007	66	\$72,218	\$4,766,386	13	\$50,514	\$656,678	11	\$80,610	\$886,707	90	\$70,109	\$6,309,771
2008	64	\$63,644	\$4,073,213	11	\$72,754	\$800,291	9	\$38,103	\$342,931	84	\$62,100	\$5,216,434
2009	62	\$74,682	\$4,630,273	13	\$83,946	\$1,091,301	13	\$40,588	\$527,648	88	\$71,014	\$6,249,222
2010	65	\$51,775	\$3,365,380	10	\$64,980	\$649,803	10	\$26,374	\$263,737	85	\$50,340	\$4,278,921
2011	71	\$78,995	\$5,608,631	11	\$69,899	\$768,887	13	\$33,367	\$433,770	95	\$71,698	\$6,811,288
2012	67	\$62,178	\$4,165,950	9	\$57,653	\$518,875	11	\$48,617	\$534,785	87	\$59,996	\$5,219,610
2013	69	\$95,145	\$6,565,035	9	\$136,169	\$1,225,519	14	\$78,534	\$1,099,482	92	\$96,631	\$8,890,037
2014	65	\$86,794	\$5,641,600	11	\$85,525	\$940,770	11	\$81,877	\$900,650	87	\$86,012	\$7,483,020
2015	65	\$105,671	\$6,868,646	11	\$123,508	\$1,358,586	13	\$66,174	\$860,265	89	\$102,107	\$9,087,497
2016	70	\$110,575	\$7,740,223	11	\$109,820	\$1,208,024	9	\$117,286	\$1,055,571	90	\$111,154	\$10,003,819
2017	65	\$128,647	\$8,362,048	12	\$137,869	\$1,654,429	10	\$143,391	\$1,433,907	87	\$131,614	\$11,450,384
2018	62	\$44,745	\$2,774,213	12	\$57,567	\$690,809	11	\$81,300	\$894,300	85	\$51,286	\$4,359,322
2019	66	\$62,263	\$4,109,337	9	\$115,427	\$1,038,840	10	\$63,455	\$634,553	85	\$68,032	\$5,782,730
2020	64	\$23,599	\$1,510,322	8	\$47,752	\$382,016	7	\$46,501	\$325,508	79	\$28,074	\$2,217,845
2021	54	\$55,054	\$2,972,895	9	\$134,139	\$1,207,252	9	\$75,498	\$679,478	72	\$67,495	\$4,859,625
2022	51	\$42,255	\$2,154,983	5	\$113,641	\$568,203	9	\$29,234	\$263,103	65	\$45,943	\$2,986,290
2023	48	\$26,264	\$1,260,691	10	\$31,081	\$310,811	6	\$46,901	\$281,404	64	\$28,952	\$1,852,906
2024	45	\$16,300	\$733,490	6	\$24,109	\$144,654	5	\$117,297	\$586,486	56	\$26,154	\$1,464,631

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- When fewer than four individuals in a cohort make landings, counts of participation and earnings are masked for both that cohort and at least one other cohort that year.
- 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.



February 3, 2026

Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
P.O. Box 25526
Juneau, Alaska 99802-5526

Re: Alaska Peninsula Proposals

Dear Madam Chair Carlson-Van Dort and Board of Fisheries Members:

Concerned Area M Fishermen (CAMF) was founded 40 years ago and has been active in the Board of Fisheries process since 1984. CAMF submits these comments on proposals you will be considering at the upcoming Alaska Peninsula and Chignik Board of Fisheries meeting. CAMF represents the interests of drift gillnet fishermen who fish in Area M. Our membership includes approximately 95% of the permit holders active in the fishery. We currently have about 100 members. CAMF members participate in the drift gillnet fishery on the North Alaska Peninsula, which is managed under the provisions of the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369, and the fisheries along the South Peninsula, including the South Unimak and Shumagin Islands June Salmon Fishery (the June Fishery), 5 AAC 09.365, and the Post-June Fishery, 5 AAC 09.366. CAMF has been active in the board process for 40 years, contributing to the development of these management plans, and we look forward to working with you again this year.

As you review the proposal packet, it will reveal that for the first time in over 100 years, the North Peninsula drift gillnet fleet and Bristol Bay interests won't be at a regulatory meeting fighting over fish. This is due to a formal agreement made in April 2025 between the Lower Bristol Bay Advisory Committee and CAMF to avoid submitting proposals involving each other's bases. This historic compromise significantly reduced the number of proposals before the board at this meeting.

These comments first review the North Alaska Peninsula fishery, including its historical importance and prior board actions and findings. Second, we provide an overview of the South Peninsula June and post-June fisheries, including prior board actions, WASSIP results, the management structure, and the importance to the economy of the region. Thank you for taking the time to review these comments. We welcome the opportunity to discuss with you the particulars of the drift gillnet fisheries in which our members participate, and to answer any questions you may have regarding our position on specific proposals.

Sincerely,

Bob Murphy, Executive Director
Concerned Area M Fishermen (CAMF)
Kodiak, AK 99615

CAMF Supports Proposals 113, 114, 115, 119, 121, 122, 123, 124, 134, 135, 139, 142, 144, 145, 150, 153, 154, 156, 157, 158, 159, 160, 161, 188.

CAMF Opposes Proposals 108, 109, 110, 111, 112, 116, 117, 118, 120, 126, 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, 143, 147, 148, 151, 152.



The North Peninsula Fishery

The fishery in the Northern District in the Port Moller area is primarily a drift gillnet fishery and is managed under the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369. The fleet fishes in the Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections, and targets sockeye returning to local rivers. The North Peninsula fishery is orderly. The board has consistently rejected proposals from fishermen in other management areas and groups to restrict our fishery, and we request that you do so again this year. Prior to the proposal deadline in April 2025, the Lower Bristol Bay Advisory Committee and CAMF worked together to formalize an agreement for this board meeting not to submit proposals that would cause each other's base to be heavily involved in the meeting. For the first time in over 100 years that we can document, the North Peninsula drift gillnet fleet and Bristol Bay interests are not at a regulatory meeting fighting each other over fish. We believe it would be helpful to review and summarize several aspects of the North Peninsula fishery, including prior board action and the biology, history, and management of the fishery.

Prior Board Action

Around 1992, the department, working with ADF&G staff in Bristol Bay, developed safeguards for the Ugashik River as part of a harvest strategy used as a guide to manage the North Peninsula fishery. These safeguards for the Ugashik River were implemented because it was assumed that, due to the closer proximity of the North Peninsula fisheries to the Ugashik River than other Bristol Bay systems, Ugashik River fish would compose a substantial portion of the non-local Bristol Bay harvest. Safeguards in the Ilnik Section and later Outer Port Heiden for Ugashik River state that if management actions occur in Egegik District for Ugashik River as specified in the management plan, then time and area closures would occur for Ugashik River in the Ilnik and Outer Port Heiden Sections. This was done prior to the North Peninsula regulations being codified in 1998 and prior to genetics studies being published validating the harvest of Ugashik River fish in some North Peninsula Sections. CAMF will continue to support those protections for Ugashik River in the North Peninsula fishery.

Board Findings 96-165-FB (formerly 96-09-FB) prepared at the meeting in January 1996 where the board had considered North Peninsula issues many times before that meeting, but this was the first time the board prepared a set of findings to explain its actions. The findings summarize the comments of staff and the public and provide the board's rationale for rejecting all the proposals aimed at greatly restricting the North Peninsula fishery. The findings conclude (at page 3): "Like past boards that have rejected proposals to restructure the North Peninsula fisheries, the board found no reason to reduce fishing districts, seasons, or harvests in the Northern District. The board recognizes that there may be some amount of interception of Bristol Bay fish in the Northern District. The board further finds that the Northern District fishery is not an expanding fishery and does not warrant action under the board's mixed stock policy."

Consistent with these findings, the board at its meeting in January 1998 again rejected proposals to restrict the North Peninsula fishery. The main action taken was to adopt the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369. This plan confirmed the board's and the Department's commitment to maintaining a management regime that has succeeded in achieving escapements, sustaining production, and allowing a harvest of high-quality fish. In fact, the principal action the board took in 1998 was to adopt a regulation (5 AAC 09.369(j)) permitting us earlier access to the harvestable surplus from the Ilnik River, so that the fishery better fits the timing of the run.

Northern District proposals were next considered by the board at its meeting in January 2001. Bristol Bay stakeholders advocated drastic restructuring of our fishery, relying primarily on their concerns for the status of



Kvichak sockeye. Kvichak sockeye have since been removed from stock of concern list. The board committee that reviewed the 2001 proposals found “There are no new or expanding fisheries on these stocks,” and recommended status quo for the Northern District fisheries (RC # 384, January 29, 2001). The board unanimously voted in favor of this recommendation and rejected all the Bristol Bay proposals for our area. The board in 2004 made additional revisions to the Northern District plan, including easing restrictions regarding when our fleet could fish in the Ilnik Section. These changes were intended to provide additional management flexibility for the Department to harvest local runs while ensuring that escapements are met. In 2007, the board responded to information presented by the Department showing a foregone harvest of more than 100,000 sockeye annually in the Meshik River. The Board opened up a portion of the Outer Port Heiden Section to the drift fleet, allowing the drift gillnet fleet to fish on the north side of Port Heiden. The board also authorized openings in the Ilnik Section northeast of Unangashak Bluffs, to better access returns to the Ilnik River, which likewise has experienced significant excess escapements. This regulatory change succeeded in harvesting the available surplus and bringing escapements in line with the established goals. At the 2010 meeting, the board considered proposals to roll back these provisions. The Department, while neutral on the allocation aspects of these proposals, opposed them because they could result in decreased management flexibility and lost harvest opportunity. The Department recognized that since the opening of the Outer Port Heiden Section, “excessive surplus escapements into Meshik River have not occurred.” See 2010 Staff Comments (RC 2). It should also be noted that the fishing schedule in this area is conservative, allowing us to fish only 2 ½ days per week.

At the 2013 meeting, the board did make changes to the Northern District management plan that imposed some restrictions on our fishery in the Outer Port Heiden and Ilnik Sections, including a provision for rolling closures and a limit on how far from shore we could fish. These restrictions were largely repealed at the ensuing meeting in 2016. The board’s action in removing these unnecessary restrictions came in response to an agreement between CAMF and the Nelson Lagoon Advisory Committee that resolved many of the disputes in this area. In summary, the board over the years has taken several steps to improve management in the area and provide the Department the necessary management flexibility to harvest local runs while assuring that escapements are met. These actions should be seen as an endorsement of, and a demonstration of, confidence in the current management regime.

Harvest Rates

The 9-year (from inception to the time the written report was published), and \$9,000,000 WASSIP study shows that Bristol Bay stocks are mixed in the North Peninsula catches to a higher extent than previous analyses suggested. However, the WASSIP results also show that the overall harvest rate on Bristol Bay stocks in the North Peninsula fishery was between 1.9% and 2.6%. In other words, 97.4% - 98.1% of all Bristol Bay sockeye salmon are available as escapement or harvest in Bristol Bay or elsewhere and not harvested in the North Peninsula. There is a reason these two fisheries have co-existed for at least 120 years without the North Peninsula ever having a measurable impact to Bristol Bay systems or creating measurable impacts on Bristol Bay escapement performance. Record runs into Bristol Bay year after year over the last 15 years and yet the North Peninsula harvest doesn’t reflect any increase that indicates excessive interception. The low harvest rate indicates that the impact of the North Peninsula fishery on Bristol Bay sockeye is minimal. By comparison, the error in knowing the size of the Bristol Bay return after the season is over is in the range of 3 - 4 %, roughly double the impact of the North Peninsula fishery. Any suggestion that the North Peninsula fishery poses conservation or management concerns for Bristol Bay sockeye is not supported by the available data. Bristol Bay stocks have always been a component of our harvests along the North Peninsula and are important to the economy of the Alaska Peninsula region and to the survival of the Port Moller fleet. The Bristol Bay fishery is the largest sockeye fishery in the world, and it is unrealistic to expect that no Bristol Bay sockeye will be harvested in the nearby and far smaller North Peninsula fishery.



Now we have the Nelson Lagoon interests, which are located over one hundred miles to the west of the Ilnik and Outer Port Heiden Sections who are claiming that the drift gillnet fleet harvests fish that are impacting the Nelson River (Sapsuk) River sockeye salmon runs. Genetic data from WASSIP shows small numbers of Nelson River sockeye salmon in the harvest. During the years 2006-2008, WASSIP found harvest rates of Nelson River sockeye salmon from 0% to a high of 6.5% in all the sampling from South Ilnik, North Ilnik, and Outer Port Heiden areas from 2006-2008. The Nelson River sockeye salmon run has clearly, just like other North Peninsula (and statewide sockeye salmon runs) sockeye salmon runs been cyclic. Even with intensive effort on the North Peninsula when 163 drift gillnet permit holders were active with strong harvests, Nelson Lagoon still had strong runs. King Salmon runs on the Nelson Lagoon with a BEG are some of the healthiest king salmon runs in the state based on the number of times the escapement goal has been met in the last 20 years compared to other king salmon systems statewide. Despite these facts, proposals to restrict the Port Moller drift gillnet fleet have persisted for decades without evidence of a conservation need. In 2024 and 2025 the two largest escapements ever observed in Nelson River occurred for sockeye salmon. In 2024, Nelson Lagoon fished continuously for six weeks during the entire sockeye salmon run. Even so, today's fleet in Nelson Lagoon, now about 13 permits fishing more than 21 days, could not harvest all available surplus fish. In the past, there were 50-60 permit holders fishing in Nelson Lagoon. In 2024 alone, about 2.5-3 million pounds of sockeye salmon above the upper season ending escapement goal went upriver. Past data shows that excessive number of fish about the upper escapement goal in Nelson River results in poor runs several years later.

History of Fishery

Area M drift gillnetters have fished in the Northern District since 1906, and as early as 1915 harvests of sockeye on the North Peninsula exceeded 2 million fish. In 2025, the harvest of sockeye salmon on the North Peninsula was less than 1.0 million fish for the drift gillnet fleet and for the past 3 years the drift gillnet fleet has had poor harvests and been less than two million fish. The 1960 Annual Management Report shows that as many as 50 vessels fished in the Ilnik Section (as it was then defined). The amount of effort in the Ilnik and Three Hills Sections increased in the early 1980s, but this was primarily a function of increased returns to the North Peninsula and limited entry in the 1970's which increased the number of commercial salmon fishing permits statewide. The same phenomenon also occurred in the Ugashik and Egegik Districts of Bristol Bay and statewide, where returns to those systems resulted in nearly identical percentage increases in effort and harvest. Since 1983 the harvest has been relatively stable and has not increased out of proportion to the size of North Peninsula escapements and actually is going down over the last 3 years. As the quote from the 1996 findings shows, the board specifically found that the North Peninsula fishery was not new and expanding and did not require action under the mixed stock policy. The North Peninsula fishery has existed for and has been examined intensely by past boards, none of which found any justification for adopting the kind of restrictions advocated by interests from Nelson Lagoon.

Dispersed Management

The North Peninsula drift fishery is very orderly. By keeping boats dispersed along the beach instead of concentrating around stream termini, area managers can avoid costly and management-intensive pulse fishing and escapements. Timing opening around large pulses is difficult without tools like in-river test fisheries and frequent aerial surveys prior to fish getting to the counting weirs is difficult with the available in-season assessment tools in this area. This approach allows the managers to obtain a steady stream of escapement throughout the season which results in quality escapement for the entire salmon season. The fishing season lasts from June to mid-September (when processors purchase fish this late), three or four times longer than the majority of Bristol Bay fisheries. The long coastline in our area is completely exposed to westerly weather, and fishing is inevitably interrupted in-season.



If the fleet fished only in small areas in front of river mouths, these interruptions would produce excess escapement. Because of the small size of our rivers, we do not have the flexibility to move in-river to reduce over-escapement. Dispersing the fleet over a larger area provides a crucial buffer of time between weather interruptions and the build-up of fish in front of rivers as they prepare to move upstream.

Previous proposals to restrict the North Peninsula fishery, including Proposal 116, is predicated on the assumption that terminal-style management should be universally implemented. Many vessels operating in this region are larger, deep-draft boats specifically designed for open-ocean environments. Limiting fishing activities to within 1.5 nautical miles of shore, coupled with mandatory multi-day closures along extensive sections of coastline, would constrain management flexibility, heighten the likelihood of excess escapement, and increase safety risks during periods of onshore winds. Additionally, we encourage the board to carefully consider the implications of pre-set "windows" in an escapement-based fishery, as mandatory closures may result in unmanaged passage of fish during times when escapement objectives have been achieved.

Previous studies do not indicate that fishing within 1.5 nm from shore would reduce the harvest of any specific stock, including a stock more than 130 miles away like the Nelson River. A scientific report by Boatright et al. (2016) compared genetic stock identification (GSI) results for salmon caught inside 1.5 nm versus 1.5 to 3 nm offshore in the Innik and Outer Port Heiden Sections and found no significant difference between inshore and offshore samples in these areas. As a result, moving the fleet inside 1.5 nm is unlikely to provide a measurable conservation benefit for the Nelson River.

The June Fishery

Salmon have been harvested at South Unimak and in the Shumagin Islands during the month of June for over a century. There is a reason for this: the sockeye we catch are in prime condition and of the highest quality, bringing top dollar in the market. The June fishery is very valuable to its participants, to the Alaska Peninsula economy, and the State, and deserves to be managed in a manner that recognizes and enhances its economic and social importance. This is especially critical in this time of competition with farmed salmon and as Alaska seeks to generate greater revenues from its natural resources. Past boards have understood the value of the June fishery and have been committed to assuring us a viable sockeye harvest. Since the 1980's the June fishery has been heavily regulated and the commercial fishery industry including commercial fishermen, local Peninsula communities, the Aleutians East Borough, seafood processors, along with ADF&G and other entities have worked hard to reduce the harvest of chum salmon and have been effective at doing so.

In 2004, the board adopted significant changes to the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. These revisions simplified the management approach, ending a two-decade long experiment of imposing increasingly complex and untested regulations aimed at constraining our harvest of migrating salmon, especially chum salmon. That experiment culminated in 2001 with the adoption of a management plan that substantially reduced our fishing time and severely impaired the area managers' ability to maintain a reasonable sockeye harvest. The board in 2004 recognized multiple problems with the prior plans, not the least of which is that the various limits imposed on the June fishery over time had no effect on the fisheries intended to benefit from such limits and opted instead for a straightforward management regime of scheduled openings that give us enough time on the water to sustain a reasonable harvest while providing a balance of closed periods. We encourage board members to review the findings prepared by the board in 2004 (2004-229-FB).



In adopting these changes to the June fishery management plan, the key question the board asked was whether the fishery would still perform within historical levels of harvest. The Department answered yes. Experience under the 2004 plan confirms that the Department was correct. The reduction in the chum salmon harvest has been effective over the years. The Mixed Stock Policy (5 AAC 39.220) states that (b) In the absence of a regulatory management plan that otherwise allocates or restricts harvest, and when it is necessary to restrict fisheries on stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern. Has the burden of conservation been shared among all fisheries in close proportion to their respective harvest on the stock of concern? We think it has with the time and area reductions over the years, chum salmon cap triggers in the management plan, voluntary stand-downs by the seine and drift gillnet fleets when high percentage of chum salmon are present, and the Adaptive Management Plan that is in place has clearly been effective at reducing the chum salmon harvest.

Area M fishermen well understand the need to limit their harvest of chum salmon and have taken several steps toward this end. For instance, the commercial fleet (all gear types) participates in “chum harvest pools” where all chum we catch are pooled then divided equally among the fleet. This eliminates any incentive for an individual to target chum. In addition, the fleet has voluntarily stood down and not fished when there has been an abundance of chums present. In 2022, the seine fleet further adopted a voluntary “hot spot” stand down program whereby fishermen quit fishing in certain times and areas if local chum harvest was determined to be too high. This program had 100% participation by the seine fleet, and along with the drift fleet that use a portal developed in collaboration with the Aleutians East Borough to monitor by the hour the harvest of chum in season. But it must also be recognized that occasionally there will be years when the presence of chum in Area M waters, particularly considering the dramatic increase in Asian chum hatchery production, that they will be hard to avoid but still the harvest will and can be limited by the fleet. It is also important to dispel the notion advanced by some that the chum harvest in the June fishery should only be considered as “by-catch” to the harvest of sockeye. Chum salmon have been harvested in the June fishery as long as it has existed and constitute an important economic component of the fishery even though fishermen actively try and avoid harvesting them during June.

Detractors of the June fishery have long asserted that the mixed stock nature of the fishery risks adverse biological impacts. We disagree. Based on several studies of the June fishery, including the 1987 ADF&G tagging; genetic stock identification (GSI), including Western Alaska Salmon Stock Identification Program (WASSIP) which was one of the largest fishery genetics study ever done, the 2022 GSI for chum, and the most recent chum salmon genetics study in the June South Peninsula fishery in Area M; and mark-recapture data certain conclusions have become clear:

1. Bristol Bay sockeye stocks in the fishery are highly mixed, and there is no risk that we will tap into a vein of fish from one river and have a disproportionate impact on a single stock.
2. The chum salmon harvested in our fishery originate from a wide geographic area: Japan, Russia, the AYK, Bristol Bay, the Alaska Peninsula, South Central Alaska, Canada, and the Pacific Northwest.
3. WASSIP results showed that the harvest levels of the June Fishery were smaller than the error in estimates of the size of the Bristol Bay sockeye and AYK chum runs.
4. Yukon fall chum, whose declines in the mid-1980s were cited as the basis for imposing the first chum cap, are present in very small numbers in the June fishery; and
5. Only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west or remaining in the Bering Sea due to less ice cover in recent years. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing.



The harvest rate of chum salmon bound for CWAK (AYK and Bristol Bay systems combined) in the June fishery during the WASSIP years was about 4%, while the harvest rate of CWAK chum salmon in the Bristol Bay fishery, which borders the AYK area, is about 21% (5 fold higher) and doesn't appear to have the controversy that Area M does.

In summary, the June fishery has little biological impact on the salmon runs migrating through the South Peninsula area and there is no conservation risk from permitting viable fishery to be prosecuted there. Proposals seeking to further restrict the Area M fisheries are based on the belief that there is, or should be, a priority allocation for stakeholders closer to the stream of origin of salmon stocks. This attitude is in direct conflict with the position of the State of Alaska as signatory of the Pacific Salmon Treaty, which recognizes the intrinsic equity claim for fisheries near waters where salmon grow to maturity. Within Alaska salmon are a common property resource that 'belong' to everyone, not just those nearest the stream of origin. The current June fishery management plan is working well, and data from WASSIP and recent chum genetics studies confirm the basis for prior board actions and findings. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the nine-year study.

North Alaska Peninsula Salmon Management Plan (10 proposals)

PROPOSAL 113

5 AAC 09.310. Fishing seasons. And 5 AAC 09.350. Closed waters.

Amend fishing seasons to allow more fishing time and area for set and drift net gear in the Caribou Flats Section, as follows:

5 AAC 09.310 (9). Caribou Flats Section: from June 20 to July 31 by emergency order if the season-ending sockeye salmon escapement goal at Nelson River is expected to be exceeded prior to August 1, fishing will be permitted with set and drift gillnet gear.

The Nelson (Sapsuk) River sockeye salmon escapement in 2024 exceeded the escapement goal of 97,000-219,000 fish by going over the upper escapement goal by almost 4-fold with over 750,000 sockeye salmon escaping. This was the largest escapement ever recorded for the Nelson River. In 2025, another strong escapement occurred at Nelson River with one of the largest sockeye salmon escapements on record of 552,000 fish. Past sockeye salmon returns at Nelson River that have significantly exceeded the sockeye salmon escapement goal have caused poor future production and low returns of sockeye salmon into the Nelson River. Nelson River also has a healthy King salmon run with a Biological Escapement Goal (BEG) of 2,400-5,000 fish and was met in 2025 (4,551 fish) and in most recent years and would not be impacted by this proposal since the King salmon run is over by the time the upper escapement goal would be met and inside Nelson Lagoon that fleet is already fishing 24/7 for 6 weeks without negatively impacting the King salmon returns to Nelson River.

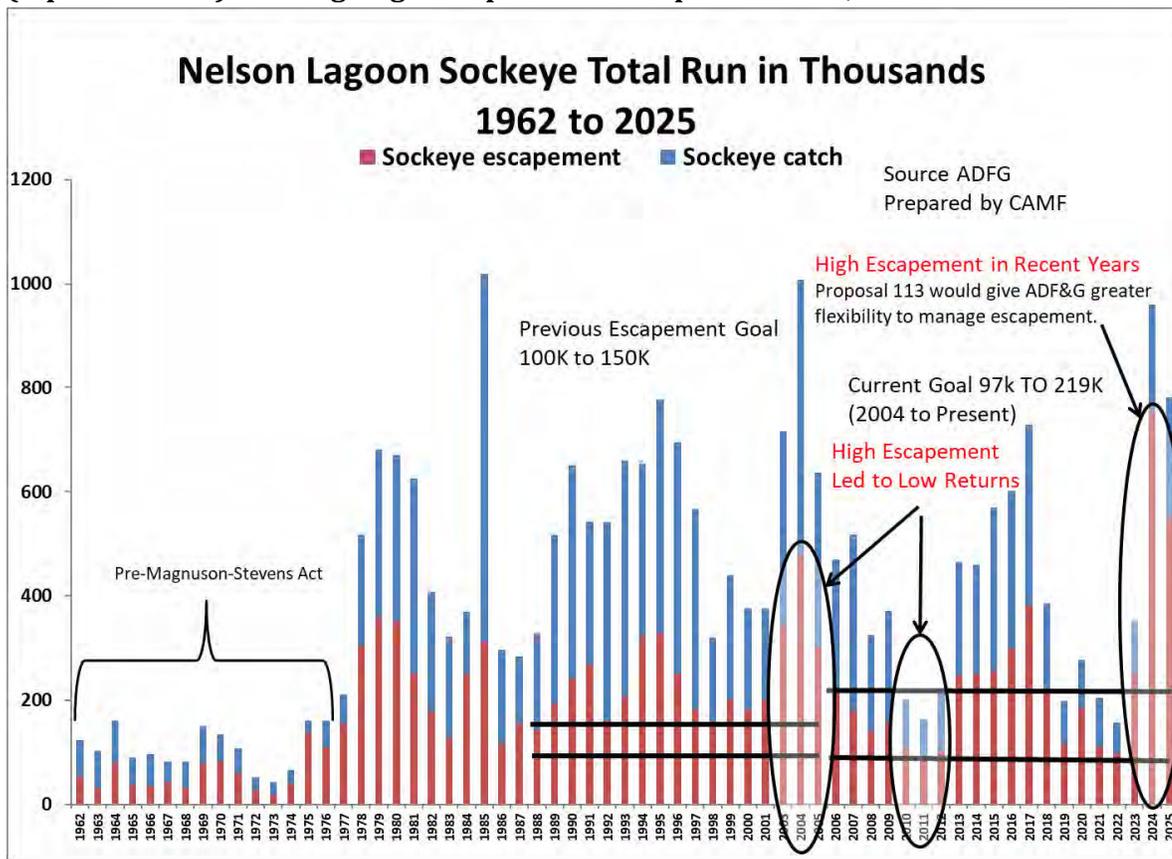
The Caribou Flats was closed to commercial salmon fishing in the late 1980's back when the effort levels fishing in Nelson Lagoon were 50-60 permits fishing. In recent years, effort levels are half of what they used to be and even with the fishery open 24/7 for the entire sockeye salmon run the limited fleet cannot control the escapement. In 2025, only 13 permits made 21 deliveries or more in a sockeye harvest that started on season that was open 45 days. The number of commercial salmon permits that are fishing in Nelson Lagoon has decreased substantially over the years and the effort levels are not capable of harvesting a good or strong return of sockeye salmon to the Nelson River. Allowing drift and set gillnet gear to fish by emergency order in the Caribou Flats Section when the upper escapement goal is expected to be exceeded would provide a practical tool to manage surplus fish without reducing



Nelson Lagoon’s ability to prosecute a fishery. Continuous fishing time as has occurred the last few years when these strong runs have occurred. Managing escapement above the upper end of the season ending escapement goal of 219,000 fish helps protect future productivity. Without a tool to address surplus fish in strong years, the risk of weak returns in subsequent cycles increases.

CAMF submitted Proposal 113 to provide opportunity to control the sockeye escapement into Nelson River which had the largest escapement on record in 2024 with 754,000 fish escaping and another strong run in 2025 of 552,000 fish, the second largest on record, exceeding the escapement goal of 97,000-219,000 fish. Escapement goals have almost always been met, in fact Nelson River has met or exceeded the escapement goal 52 of the last 53 years, the one exception was in 2011 when the sockeye salmon escapement was 8,000 fish below the lower end of the escapement goal. In 2011, the Nelson Lagoon fishery still occurred, and the harvest was 75,000 sockeye salmon. (Figure 1)

FIGURE 1. Nelson River sockeye salmon escapement (bottom bar in red) and Nelson Lagoon sockeye catch (top bar in blue) showing large escapements with poor returns, 1962-2025.



Chinook (BEG) and coho (SEG) salmon escapements have been routinely met and no fishery closures occurred for either species. Since this proposal only opens the Caribou Flats once the upper sockeye salmon escapement goal is expected to be met, there will no impact to King or coho salmon bound for the Nelson River as well since the King salmon entry into Nelson Lagoon is complete by the time this area could open and the fishery in Nelson Lagoon will also be on going at the same time.

Prior to 2023 the Nelson River sockeye salmon run was weak and had poor returns for a life cycle of sockeye salmon. In 2023, a proposal to open the Caribou Flats Section by an individual was opposed by CAMF in favor of keeping the Caribou Flats Section closed to provide a closed area in close proximity to Nelson Lagoon during these times of low sockeye salmon abundance. Those low returns have subsequently changed and the returns are some of the largest ever recorded and these escapement levels will have a negative impact on the near future returns to the Nelson River and need to be controlled which this proposal will help do when the upper season ending escapement goal is expected to be exceeded, the Caribou Flats Section will open to commercial salmon fishery to harvest excess fish over the upper escapement goal. WASSIP results showed that a very high percentage of the Nelson River reporting stock return to Nelson Lagoon. 86% in 2006, 86% in 2007, and 96% in 2008 sockeye returned to Nelson Lagoon and either harvested inside the Lagoon or counted as escapement. (Figure 2)

FIGURE 2. Nelson River harvest rates showing Nelson Lagoon catch and escapement harvest rate and then small harvest rates of Nelson River fish in Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections, 2006-2008.



PROPOSED BY: Concerned Area M Fishermen (CAMF)

CAMF POSITION: SUPPORT



PROPOSAL 114

5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

Amend the Northern District Salmon Fisheries Management Plan to delete sunset language as follows:

Delete paragraph (n) below as this language sunset in 2018 and can add confusion to the fleet.

{(n) From June 20 through July 31, the department shall manage the Bear River, Three Hills, and Ilnik Sections to conserve Bear River and Nelson River sockeye salmon stocks by allowing the passage of sockeye salmon from the northeast to the southwest of the Northern District as described in this subsection. Notwithstanding the provisions of 5 AAC 09.320, from June 20 through July 31, the commissioner shall, by emergency order, establish fishing periods for the Bear River and Three Hills Sections and that portion of the Ilnik Section between the longitude of Unangashak Bluffs and the longitude of Three Hills at 159° 49.45' W. long., during which the waters that are between the three-mile seaward boundary line, described in 5 AAC 09.301, and a line that is one and one-half miles shoreward of the three-mile seaward boundary are closed for one 24-hour period during a seven-day period. The waters located to the southwest of the open waters where a 24-hour closure has occurred will have sequential closures that allow fishing only in the waters out to the one and one-half mile line described in this subsection for the first 24 hours of an open fishing period. The provisions of this subsection do not apply after December 31, 2018.}

Proposal 114 would clean up language that has not been in effect since 2018 and should be deleted as it is not relevant as that regulation does not exist and sunsetted in 2018. The language adds confusion to the fleet as it no longer is a regulation in the fishery. This proposal is just trying to remove old regulatory language that should not be included in current regulations.

PROPOSED BY: Concerned Area M Fishermen (CAMF)

CAMF POSITION: SUPPORT

PROPOSAL 115

5 AAC 09.369. Northern District Salmon Fisheries Management Plan. Amend fishing seasons to increase fishing time in the Ilnik Section, as follows:

(j) In the Ilnik Section,

(1) notwithstanding 5 AAC 09.320(a)(4), from June 20 through July 31 {JULY 20},

(A) commercial salmon fishing will be permitted in the Ilnik Section

(i) southwest of the Unangashak Bluffs based on the abundance of Ilnik River sockeye salmon; and Bear River sockeye salmon only if management actions in the Bear River and Three Hills Sections have occurred and the July 31 lower escapement goal at Bear River is not expected to be met, and (ii) northeast of the Unangashak Bluffs based on the abundance of Meshik River and Ilnik River sockeye salmon, combined;

(B) if the commissioner closes that portion of the Egegik District specified in 5 AAC 06.359(c) for conservation of Ugashik River sockeye salmon stocks, the commissioner may, by emergency order, close the Ilnik Section and immediately reopen the Ilnik Section, with additional fishing restrictions that the commissioner determines necessary;

(2) from August 1 [JULY 21] through August 15, fishing periods may be modified in the Ilnik Section based on the abundance of Bear River sockeye salmon stocks;

(3) after August 15, fishing periods may be modified in the Ilnik Section based on the abundance of

(A) coho salmon stocks in the Unangashak and Ilnik Rivers, and the Ocean River when the Ocean River flows directly into the Bering Sea; and



(B) the Bear River late-run sockeye salmon stock.

This proposal codifies the way ADF&G is currently managing the Ilnik Section for Bear River in the Ilnik Section. It seeks to extend the date from July 20 to July 31 for management of the Ilnik River in the Ilnik Section. Currently, Bear River sockeye salmon are not identified as a stock that is to be considered in the management of the Ilnik Section prior to July 31. If the department has concern for Bear River, then management actions can occur in the Ilnik Section southwest of Unangashak Bluffs for Bear River sockeye salmon from June 20 to August 15, which the department is already doing but is not fully codified in June and July. The department has made management actions in recent years for Bear River in the Ilnik Section, including in 2023 when a weak sockeye salmon run into Bear River caused the entire closure of the Bear River and Three Hills Sections for the months of June and July, and the department also closed the entire Ilnik Section to Strogonof Point for 17 days for Bear River sockeye salmon even when the Ilnik River sockeye salmon was exceeding the upper escapement goal. The extent of the closure in 2023 for Bear River was over 115 miles of coastline. This was an extreme burden for the fleet and codifying these action and allowing the department to part of the Ilnik Section southwest of Unangashak Bluffs and not the portion from Unangashak Bluffs to Strogonof Point in the Ilnik Section

The Bear River has two sockeye salmon runs: an early run that begins in early June and ends July 31, and a late run that begins August 1 and goes into September. If adopted this proposal would codify management actions to be taken for Bear River sockeye salmon prior to July 31 in the Ilnik Section southwest of Unangashak Bluffs in the Ilnik Section if management actions have not been effective for the early Bear River sockeye salmon run in the Bear River and Three Hills Sections, and the July 31 lower escapement goal at Bear River is not expected to be met. This means about 100 miles in the Bear River, Three Hills, and southern portion of the Ilnik Section would be closed. Currently, only Ilnik River sockeye salmon are considered in the management plan southwest of Unangashak Bluffs from June 20 to July 20. The Ilnik and Bear Rivers have been managed in the Ilnik Section by ADF&G from June 20 to July 31 in recent years and this would codify those management actions southwest of Unangashak Bluffs. This would not impact the department in any way for management of the Bear, Sandy, Ilnik, and Meshik Rivers.

The Ilnik River sockeye salmon run has early run timing and continues after July 20 as shown by weir counts in 2025 when the weir was left in later than usual and the last day of counting on July 20 had a relatively strong weir count compared to other days in 2025. When the department keeps the weir in to count the tail of the run in some years when escapements are low, there are still fish entering July 20 as one would expect and is seen in neighboring Bristol Bay and North Peninsula sockeye salmon systems. None of these areas have runs that are completely over by July 20. The July 20 date in the management plan for Ilnik River was chosen in 1990 when run timing information was not known for the Ilnik River. The Ilnik River weir was first installed in 1990 and ADF&G put July 20 in the harvest management plan strategy as a date in 1990 not knowing the actual run timing. Typically, the weir is removed around July 15-17 when the run decreases and the escapement goal has been met or exceeded. This proposal does not require the department to change the removal date of the weir. Like all other early run systems on the Alaska Peninsula that have known run timing, like Nelson, Bear, and Sandy Rivers, that have the season ending escapement goal around July 31, this will allow the department to manage for Ilnik and Bear River sockeye salmon in the Ilnik Section southwest of Unangashak Bluffs from June 20 to July 31 and even until August 15 as stated in the management plan. The following will remain the same in the management plan where it states from August 1 to August 15 the Ilnik Section is managed on the basis of Bear River (now late run) sockeye salmon since the Ilnik River sockeye salmon run is completely over and the Ilnik River coho salmon has not started yet. After August 15, the Ilnik Section is managed on the basis of Ilnik River coho salmon and that also remains in the plan. Protection for Ugashik

River sockeye salmon in the Ilnik Section that have been in effect since the early 1990's, still remain unchanged in the management plan.

WASSIP data shows the further away from the river of origin the less the harvest rate on that stock. The number of sockeye salmon bound for Bear River that was harvested in that part of the Ilnik Section southwest of Unangashak Bluffs ranged from 10%-17% between 2006-2008. This proposal allows ADF&G to continue managing Bear River sockeye salmon in that portion of the Ilnik Section with the harvest rate from 10-17% and codifies that management which isn't in the management plan at this time. In that part of the Ilnik Section northeast of Unangashak Bluffs to Strogonof Point the harvest rates ranged from 0.5%-3% between 2006-2008. This clearly shows that management actions in the entire Ilnik Section are not necessary to protect Bear River sockeye salmon stocks prior to August 1, and that portion northeast of Unangashak Bluffs to Strogonof Point need not be managed for Bear River when the Ilnik River run is occurring. (Figure 1). If management actions for Bear River are necessary in the Ilnik Section, only that portion of the Ilnik Section SW of Unangashak Bluffs should be closed. This proposal does not limit the departments ability to manage for the Ilnik River sockeye salmon and still permits management of the Bear River Section and allows about 100 miles (statue) of coastline in the Bear River, Three Hills, and Ilnik Section southwest of Unangashak Bluffs, versus the department closing 115 miles (statute) of coastline which occurred in 2023 when the upper Ilnik River sockeye salmon escapement goals was exceeded and the entire area was closed.

FIGURE 1. Bear River sockeye salmon harvest rates in the Bear River, Three Hills, SW Ilnik, NE Ilnik and Outer Port Heiden Areas, 2006-2008. Harvest rates in the NE Ilnik (Yellow) and Outer Port Heiden (Orange) area are shown in the pie graph and are small, 2006-2008.



PROPOSED BY: Concerned Area M Fishermen (CAMF)
 CAMF POSITION: SUPPORT



PROPOSAL 116

5 AAC 09.369. Northern District Salmon Fisheries Management Plan.

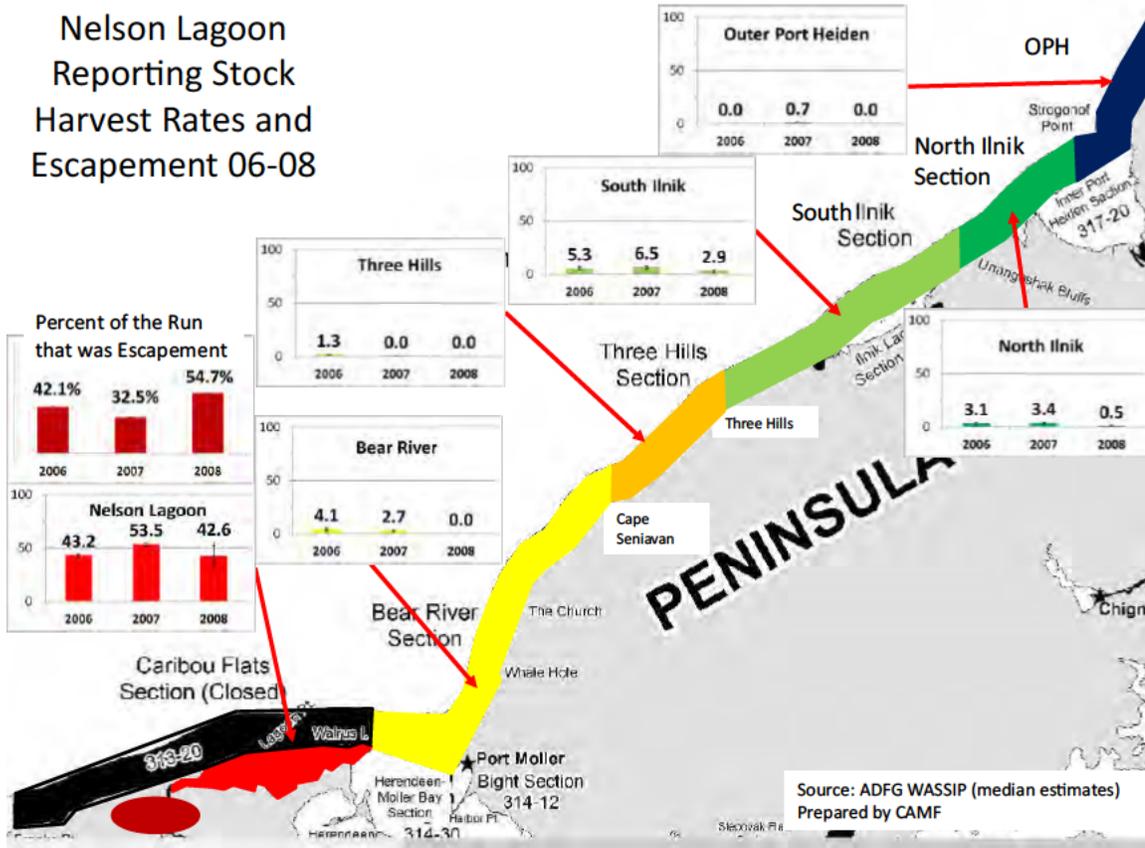
Amend the Northern District Salmon Fisheries Management Plan to decrease commercial salmon fishing time and area to drift gillnet gear as follows:

(n) From June 20 through July 31, the department shall manage the Bear River, Three Hills, [AND] Ilnik Sections and Outer Port Heiden sections to conserve [BEAR RIVER AND] Nelson River sockeye salmon stocks by allowing the passage of sockeye salmon from the northeast to the southwest of the Northern District [AS DESCRIBED IN THIS SUBSECTION]. Notwithstanding the provisions of 5 AAC 09.320, from June 20 through July 20 [31], the commissioner shall, by emergency order, establish fishing periods for the Bear River, [AND] Three Hills, [SECTIONS AND THAT PORTION OF THE] Ilnik and Outer Port Heiden Sections [SECTION BETWEEN THE LONGITUDE OF UNANGASHAK BLUFFS AND THE LONGITUDE OF THREE HILLS AT 159° 49.45' W. LONG.], during which these sections shall be [THE WATERS THAT ARE BETWEEN THE THREE-MILE SEAWARD BOUNDARY LINE, DESCRIBED IN 5 AAC 09.301, AND A LINE THAT IS ONE AND ONE-HALF MILES SHOREWARD OF THE THREE-MILE SEAWARD BOUNDARY ARE] closed concurrently for one 96-hour [24-HOUR] period during a seven-day period, however, if interim escapement objectives are being exceeded at either the Ilnik, Sandy, or Bear Rivers, the commissioner may, by emergency order, allow fishing periods in the waters from the shore out to one and one-half mile line in those sections during the closure period established under this subsection [. THE WATERS LOCATED TO THE SOUTHWEST OF THE OPEN WATERS WHERE A 24- HOUR CLOSURE HAS OCCURRED WILL HAVE SEQUENTIAL CLOSURES THAT ALLOW FISHING ONLY IN THE WATERS OUT TO THE ONE AND ONE- HALF MILE LINE DESCRIBED IN THIS SUBSECTION FOR THE FIRST 24 HOURS OF AN OPEN FISHING PERIOD. THE PROVISIONS OF THIS SUBSECTION DO NOT APPLY AFTER DECEMBER 31, 2018].

Proposal 116 originating from the Nelson Lagoon Advisory Committee is similar in the impact to a proposal that was amended at the 2023 Alaska Board of Fisheries meeting in which the one major North Peninsula shore-based processor submitted that states they would not be able to keep their doors open if adopted with the reduction of fish expected from that proposal. (*RC 193 2023 BOF Area M meeting*). Now that company, (Peter Pan Seafoods) ceased buying/processing in Port Moller during the 2024 season even though this proposal did not pass in 2023. If this proposal is adopted, the impact to the Port Moller area gillnet fleet will be as devastating as suggested in 2023.

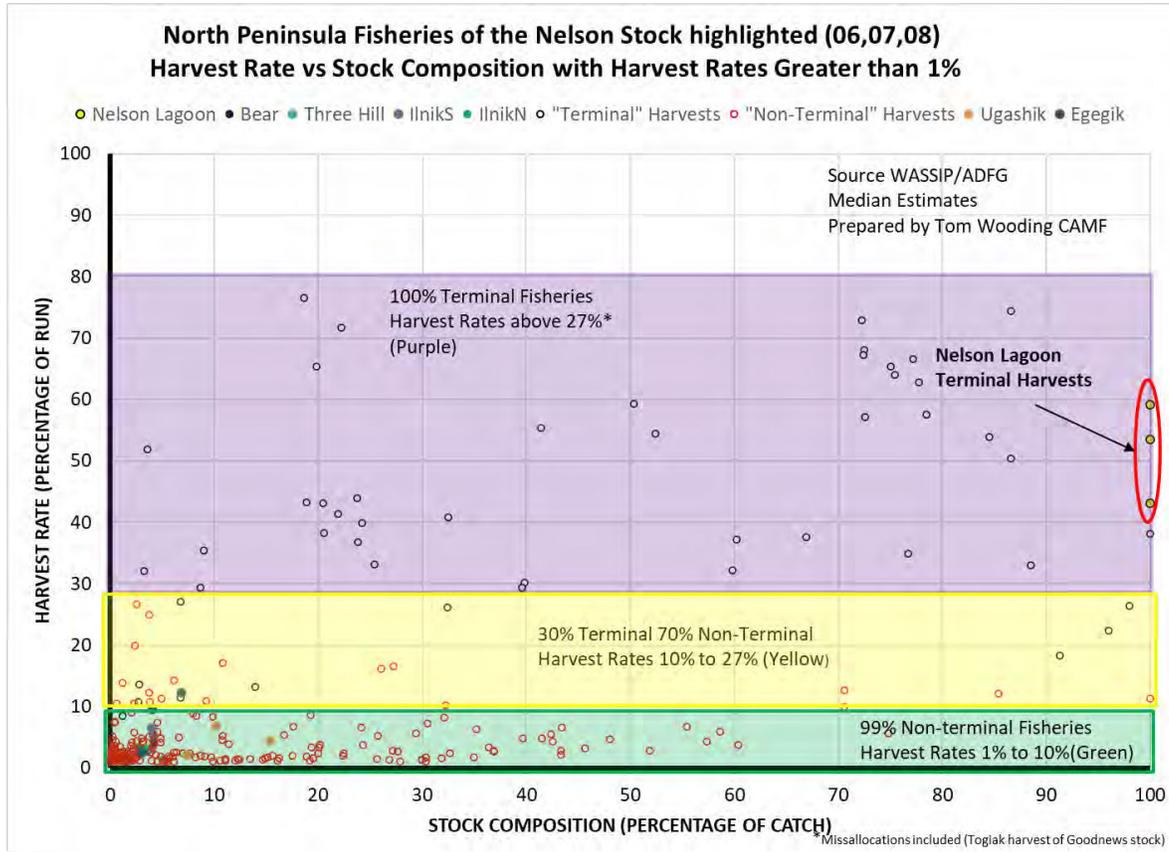
Proposal 116 seeks to change the entire management plan in the Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections which are all currently managed for river systems in the areas with long-standing management practices. This proposal seeks to have these areas entirely managed on Nelson River, a system that is already exceeding escapement goals (See Proposal 113 for further details) and clearly has no conservation issues at all in recent years. The proposal seeks to have mandatory closure windows of ninety-six consecutive hours over a 7 day period concurrently in the Bear River, Three Hills, Ilnik, and Outer Port Heiden Section which is 130 miles of coastline. Regulations currently allow fishing out to three nautical miles from shore in State of Alaska waters. Genetics study (WASSIP) shows the further away from Nelson Lagoon the less fish are harvested bound for Nelson Lagoon (Figure 1). Harvest rates on Nelson Lagoon sockeye salmon in the Outer Port Heiden Section (130 miles from Nelson Lagoon) were 0.7% in 2007 and 0% in 2008.

FIGURE 1. Nelson River sockeye salmon harvest rates in the Bear River, Three Hills, Ilnik, and Outer Port Heiden Section, 2006-2008 showing low harvest rates of Nelson River sockeye salmon.



In the Bear River, Three Hills, and Ilnik (South and North areas) Sections for the years 2006-2008 during the WASSIP study, the harvest rate of Nelson Lagoon sockeye salmon ranged in these areas individually from 0% (observed in 3 areas over the period) to a high of 6.5% in the southern part of the Ilnik Section in 2007. A harvest rate of 6.5% means 6.5 out of every 100 fish for the Nelson River were harvested in that area, meaning that 93.5 out of every hundred fish escaped to the river or were caught in Nelson Lagoon, or a portion was harvested elsewhere but not in the area the proposer is trying to limit. In the Outer Port Heiden Section the harvest rate on Nelson River sockeye salmon ranged from 0.0%-0.7%. Clearly this shows that the Bear River, Three Hills, Ilnik, and Outer Port Heiden Section are not responsible for significant impacts to the Nelson River sockeye salmon runs and this proposal has no merit. In fact, out of district harvest rates occur throughout the WASSIP fisheries.

FIGURE 2. Nelson Lagoon harvest rates of Nelson River sockeye salmon shown in the red circle well within the range expected for Terminal Fishing Areas, 2006-2008.



Definitions and explanation for Figure 2.

- WASSIP: The 9-year 9-million-dollar study is the most comprehensive examination of Western Alaskan salmon fisheries ever done.
- Terminal Fisheries: Harvests that occur where stream of origin is in the same district as the fishery.
- Non-Terminal Fisheries: Harvests that take place in a district other than the stream of origin.
- 3 different seasons, 25 different fisheries, and 23 different reporting stocks. For a total of 1725 individual data points.
- All observations below 1% harvest rate are removed from the graph to reduce clutter (1459)
- 266 remain that have a harvest rate of 1% or greater.
- Percentage of the Run (Harvest Rate) vs Percent of the catch (Stock composition)
- Three clear zones of varying Harvest Rates. Zero clear zones of Stock Composition.
- The top zone in purple are 100% terminal harvests.
- The middle zone in Yellow is a transitional zone where the Terminal and Non-Terminal harvests are mixed.
- The lower zone in green represents Harvest rates below 10% are comprised of 99% non-terminal harvest.

The Nelson River needs to have more harvest on that stock and not less to avoid a run failure which has happened due to excessive escapement in the past. This proposal seeks to destroy the North Peninsula drift gillnet fishery by putting arbitrary 96-hour closure windows over a 7 day period and allowing the fleet only to fish out to 1.5 mile from shore for 130 miles of the entire coastline. Fishing within 1.5 nautical miles of shore which is a large safety issue for the fleet especially with onshore winds where the Bering Sea conditions makes it impossible to fish near shore.



Currently State of Alaska waters allow fishing here and throughout most of the state out to 3 nautical miles from shore.

Many vessels in this fishery are larger, deep-draft boats designed for open-ocean conditions. Restricting fishing to within 1.5 nautical miles of shore and imposing mandatory multi-day closures across a long stretch of coastline would reduce management flexibility, increase the risk of excess escapement, and raise safety concerns during onshore wind events. We also encourage the board to view pre-set windows cautiously in an escapement-based fishery, because mandatory closures can allow fish to pass unmanaged during periods when escapement objectives are already being met.

Previous studies do not indicate that fishing within 1.5 nm from shore would reduce the harvest of any specific stock, including a stock more than 130 miles away like the Nelson River. A scientific report by Boatright et al. (2016) compared genetic stock identification GSI_results for salmon caught inside 1.5 nm versus 1.5 to 3 nm offshore in the Ilnik and Outer Port Heiden Sections and found no significant difference between inshore and offshore samples in these areas. ADFG has always allowed harvest opportunity on the outside beach of the North Peninsula using weir counts and aerial surveys when escapement levels warrant openings. If escapement levels are below goals, the fishery is closed to allow additional escapement. WASSIP showed that harvest rates diminish dramatically with distance.

The Board of Fisheries should understand that there have been significant changes in the seafood processing companies in Alaska in the last several years. In 2023, the North Peninsula had 3 major processors, now there is one. If that same language from the 2023 meeting that is similar in the detrimental impacts if Proposal 116 is adopted, the impact to the industry is likely less than half the harvest that has occurred will be the norm, and that impact will be felt by all North Peninsula fishermen. The North Peninsula drift gillnet fishery from Port Moller to Outer Port Heiden has been struggling for the last 3 years and can ill afford to have more unjustified restrictive regulations. The number of drift gillnet vessels has decreased by about 40 vessels from 2023 to 2025. For these reasons, we urge the board again to reject Proposal 116 as it lacks supporting evidence and would severely undermine the North Peninsula fishery.

PROPOSED BY: Nelson Lagoon Advisory Committee

CAMF POSITION: OPPOSED

PROPOSAL 117

5 AAC 09.369 Northern District Salmon Fisheries Management Plan.

Amend the Northern District Salmon Fisheries Management Plan as follows: Require that Northern Alaska Peninsula Coho commercial fishermen report their steelhead bycatch.

The proposer states the number of steelhead that are caught in the coho commercial fishery is unknown and it is important to know if there is a significant bycatch that may be contributing to the decline in steelhead number.

This proposal is not needed as there are already regulations in effect for fishermen to report the catch of steelhead. Also, there is no directed coho salmon fishery on the North Peninsula. The steelhead run occurs in September and peaks in October and the fleet has stopped fishing typically around August 21.

PROPOSED BY: David Luthy

CAMF POSITION: OPPOSED



PROPOSAL 118

5 AAC 09.369 Northern District Salmon Fisheries Management Plan.

Amend the Northern District Salmon Fisheries Management Plan Require that Northern Alaska Peninsula Coho commercial fishermen report their steelhead bycatch.

This proposal is not needed as there are already regulations in effect for fishermen to report the catch of steelhead. Also there are no directed coho salmon fishery on the North Peninsula. The steelhead run occurs in September and peaks in October and the fleet has stopped fishing typically around August 21.

PROPOSED BY: Jay Michael Watt

CAMF POSITION: OPPOSED

South Alaska Peninsula Salmon June Management Plan (10 proposals)

PROPOSAL 119

5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

Amend the Southeastern District Mainland Salmon Management Plan to increase commercial salmon fishing time for set gillnet and seine gear as follows:

Amend the Southeastern District Mainland Salmon Management Plan to allow commercial salmon fishing with set gill net gear, and after July 11, purse seine gear concurrent to open commercial salmon fishing periods in the Chignik Management Area, as follows:

Revise the Southeastern District Mainland Management Plan to allow commercial salmon fishing with set net gear and after July 11 seine gear concurrent to the Chignik Area Commercial Salmon Fishery as follows:

Conduct concurrent fishing periods between area L (Chignik) and Southeastern District Mainland (SEDM). (a) Elimination of the harvest of 300,000 – 600,000 sockeye salmon in the Chignik Area before fishermen in SEDM can harvest salmon; (b) to fish concurrently while Area L (Chignik) fishermen are fishing Area M fishermen are fishing in SEDM area.

CAMF Supports this proposal as it would benefit the SEDM fishery.

PROPOSED BY: Jack R Foster Jr, Amy M Foster, Jack R Foster III

CAMF POSITION: SUPPORT

PROPOSAL 120

5 AAC 09.330. Gear

5 AAC 09.360 Southeastern District Mainland Salmon Management Plan

Amend the *Southeastern District Mainland Salmon Management Plan* to reduce fishing time and area for seine gear as follows:

This would eliminate purse seine gear as a legal commercial gear type in the Southeastern District Mainland (SEDM) portion of the Southeastern District from July 11 through July 25.

CAMF Opposes this proposal as it would eliminate a long-standing fishing gear from the SEDM fishery.

PROPOSED BY: Axel S Kopun

CAMF POSITION: OPPOSE



PROPOSAL 121

5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

Remove 600,000 fish sockeye salmon allocation from the Southeastern District Mainland Salmon Management Plan, as follows:

(b) Excluding Orzinski Bay north of a line from Elephant Point 55° 41.92' N. lat., 160° 03.20' W. long. In the East Stepovak, Stepovak Flats, Southwest Stepovak, Balboa Bay, and Beaver Bay Sections, and before July 1 in the Northwest Stepovak Section, manage the Southeastern District Mainland as near as possible to the 7.6 percent of the sockeye salmon harvest in the Chignik Area.

CAMF Supports this proposal as it would benefit the SEDM fishery.

PROPOSED BY: Jim Smith

CAMF POSITION: SUPPORT

PROPOSAL 122

5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

Amend the Southeastern District Mainland Salmon Management Plan to make changes to Chignik River sockeye salmon allocation as follows:

- (1) The percentage of Chignik-bound sockeye salmon allocated to the SEDM fishery is 20% (7.6%) of the total number of Sockeye salmon harvested in the CMA through July 25
- (2) from June 1 through July 25 80% of the sockeye salmon caught in SEDM are considered to be Chignik-bound salmon, excluding NWSS after July 1.

CAMF Supports this proposal as it would benefit the SEDM fishery.

PROPOSED BY: Emil Mobeck

CAMF POSITION: SUPPORT

PROPOSAL 123

5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

Amend the Southeastern District Mainland Salmon Management Plan to reflect changes to Chignik River sockeye salmon allocation as follows:

- (b) The allocation and the fishery prosecuting plan for SEDM fishery.
 - (1) In the years in the Chignik district fishery, when there is no local or very limited processing capacity, the allocated harvest to Chignik (600,000) will be waived, (300,000) first run and (300,000) second run. The SEDM percent of 7.6 will also be waived. The SEDM harvest will be managed on the escapement of Chignik sockeye. When the midrange of the first run escapement is met (350,000) the SEDM area will open for fishing. When the lower end of the second run escapement is met (240,000) the SEDM will open for fishing.
 - (2) In the years in the Chignik fishery when there are 30 or less fishing boats in the Chignik district, the allocated sockeye to the Chignik fishing boats, with a unique registered Alaska ADF&G number will be (100,000) on first run and (100,000) on second run with total of (200,000) for both runs. The allocated harvest percent to SEDM will be 21 percent of the sockeye harvested by the Chignik fishing boats, with registered Alaska ADF&G number.
 - (3) In the years in the Chignik fishery when there are 31 to 60 fishing boats in the Chignik district, the allocated fish to the Chignik fishing boats, with a unique registered Alaska ADF&G number will be (200,000) on first run and



(200,000) on second run with total of (400,000) for both runs. The allocated harvest percent to SEDM will be 14 percent of the sockeye harvest of the Chignik fishing boats, with registered Alaska ADF&G number.

(4) In the years in the Chignik fishery when there are 61 or more fishing boats in the Chignik district, the allocated fish to the Chignik fishing boats, with a unique registered Alaska ADF&G number will be (300,000) on first run and (300,000) on second run with total of (600,000) for both runs. The allocated harvest percent to SEDM will be 7.6 percent of the sockeye harvest of the Chignik fishing boats, with registered Alaska ADF&G number.

(g) The percentage of sockeye salmon destined for the Chignik River that are harvested in the Southeastern District Mainland fishery may be permitted to fluctuate above or below the allocated percent to SEDM in 5 AAC 09.360 (b), (2), (3), (4) of this section [7.6 percent] of sockeye salmon harvest in the Chignik Area at any time before July 25.

CAMF Supports this proposal as it would benefit the SEDM fishery.

PROPOSED BY: Edgar L. Smith

CAMF POSITION: SUPPORT

PROPOSAL 124

5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

Amend the Southeastern District Mainland Salmon Management Plan to reflect changes to Chignik River sockeye salmon allocation as follows:

5 AAC 09.360. f. The estimate of Sockeye Salmon destined for the Chignik River has been determined to be [80 PERCENT] between 55 and 68 percent of Sockeye Salmon harvested in the East Sepovak, Stepovak Flats, Southwest Stepovak, Balboa Bay, and Beaver Bay Sections, and before July 1 in the Northwest Stepovak Section. Beginning July 1, All Sockeye Salmon taken in the Northwest Sepovak Section are considered to be destined for Orzinski Bay

CAMF Supports this proposal as it would benefit the SEDM fishery.

PROPOSED BY: Jim Smith

CAMF POSITION: SUPPORT

PROPOSAL 127

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Establish a 10 consecutive day closure between June 10 and June 23 for seine and drift gillnet.

This proposal would close the June fishery in the South Unimak and Shumagin Islands area from June 10-June 23 which is almost the entire fishery for the drift gillnet and purse seine fishermen. The June fishery has been the subject of extensive scientific stock identification work examining the harvest of chum, sockeye, and Chinook salmon and the place of origin of those fish for four decades or more.

Bristol Bay sockeye stocks and chum stocks in the fishery are highly mixed, and there is no risk of having a disproportionate impact on any single stock. This is due to the dynamics of maturing salmon in the North Pacific.

Figure 1. First year at Sea (Source INPFC Bulletin #34 based on research from 1956 to 1971)

Sockeye leave Bristol Bay to feed in North Pacific and Bering Sea

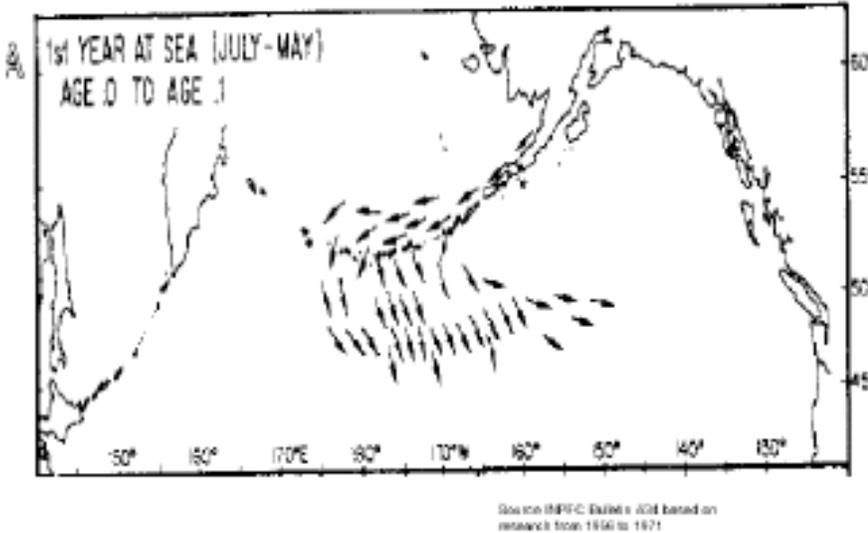
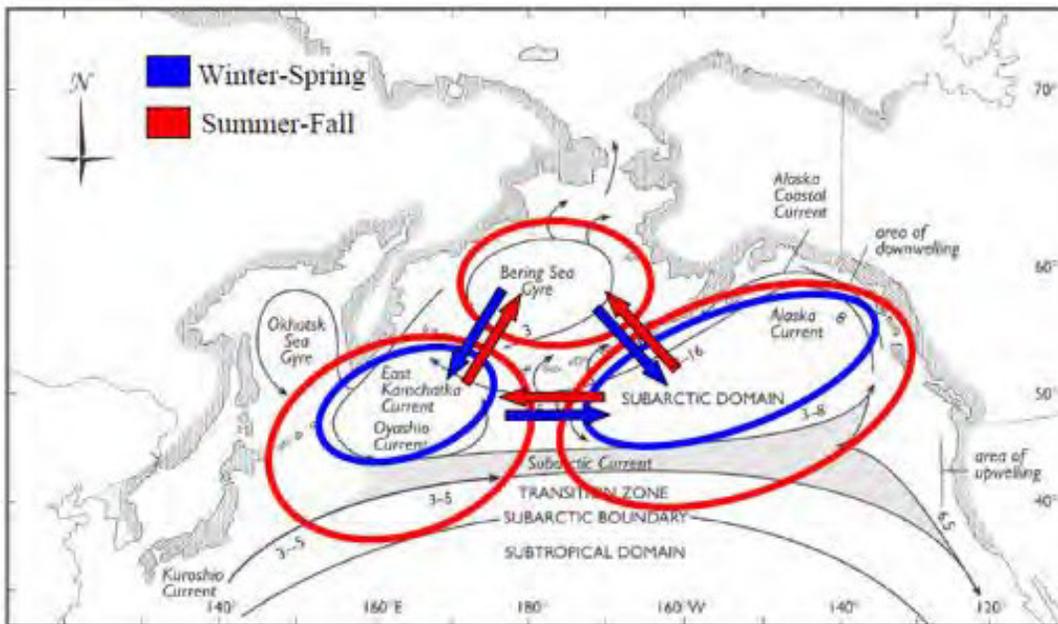


Figure 2. BASIS results confirm general conceptual Model of seasonal movements of salmon in the Bering Sea. (Source: Myers et al. 2007) with Base map showing oceanographic features and approximate current speed (km/d) (Source: Quinn 2005).



The mixture was confirmed by ADFG. ADFG Genetic Lab report “Migration patterns of sockeye salmon in the Bering Sea (October 2004; Figure 3)”.

Figure 3. The distribution of August immature sockeye salmon.

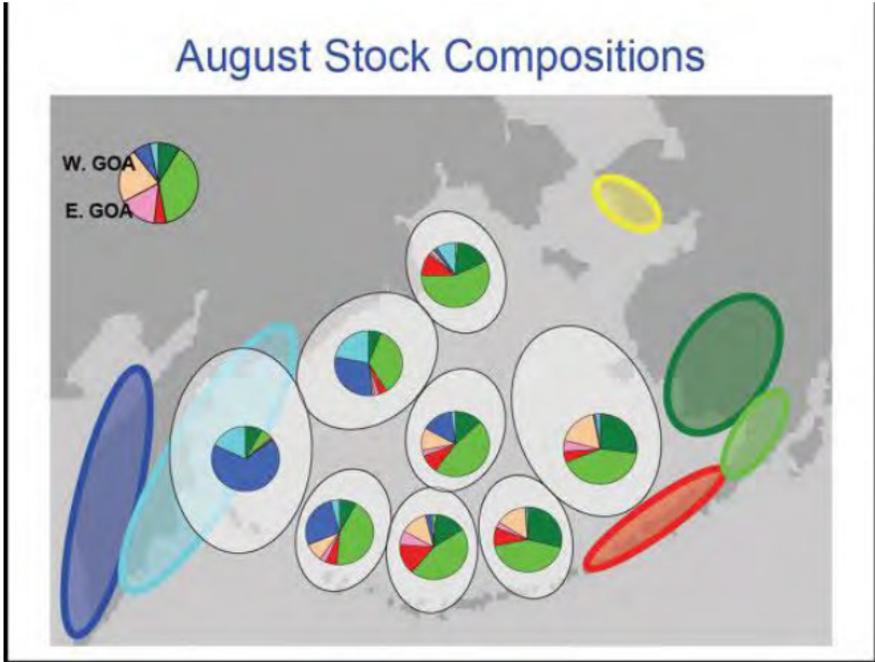


Figure 4. NPAFC Bulletin No. 1 “Genetic Stock ID of Chum Salmon Harvested Incidentally in 1994 and 1995 Bering Sea Trawl Fishery” (Wilmot et al, NOAA).

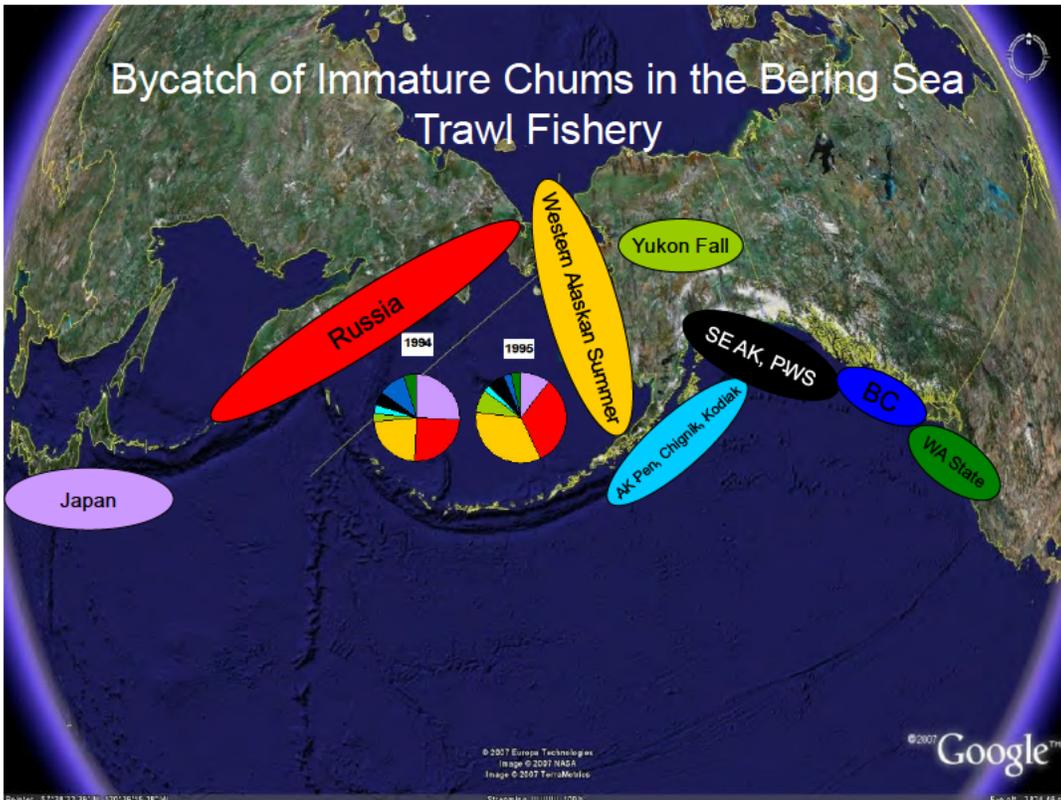


Figure 5. Chum and sockeye salmon move when water gets colder (fall and winter).

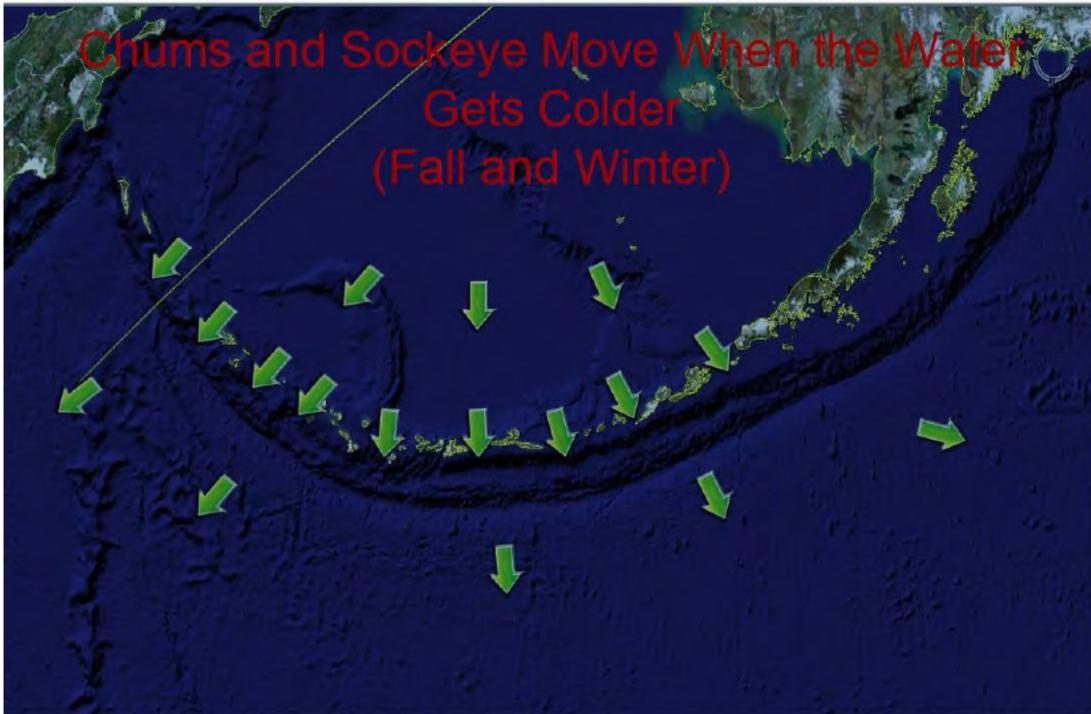


Figure 6. As chum salmon age they mix. Source: NPAFC Bulletin No.5, "Stocks Origins of Chum Salmon in the Gulf of Alaska during Winter as Estimated with Microsatellites" (Beacham et al) 2009.

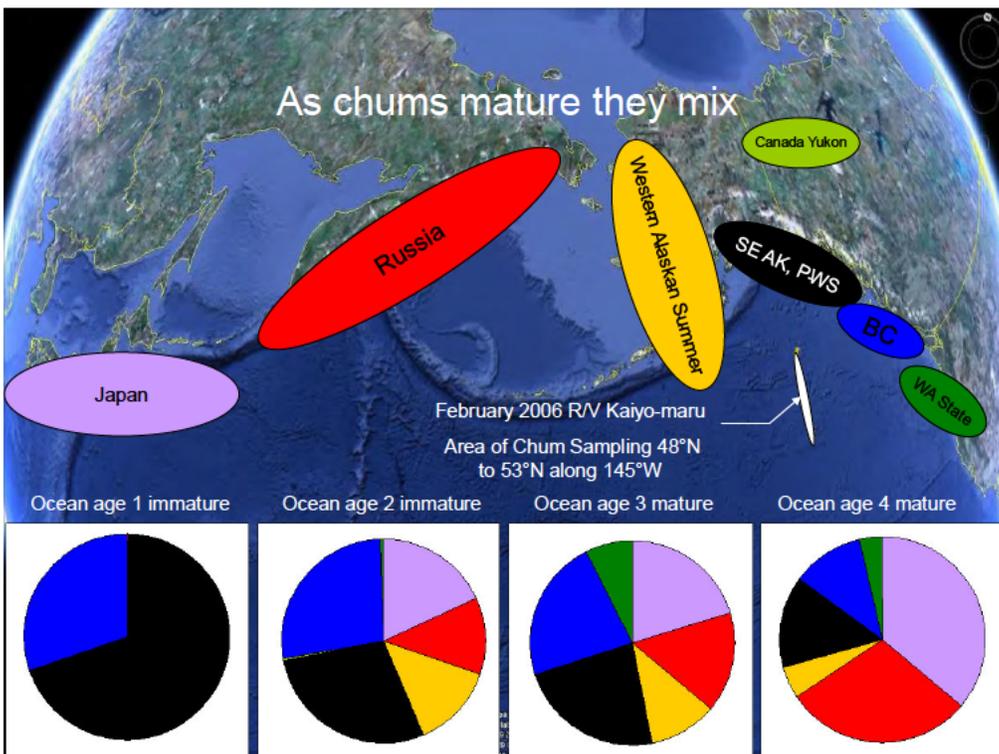
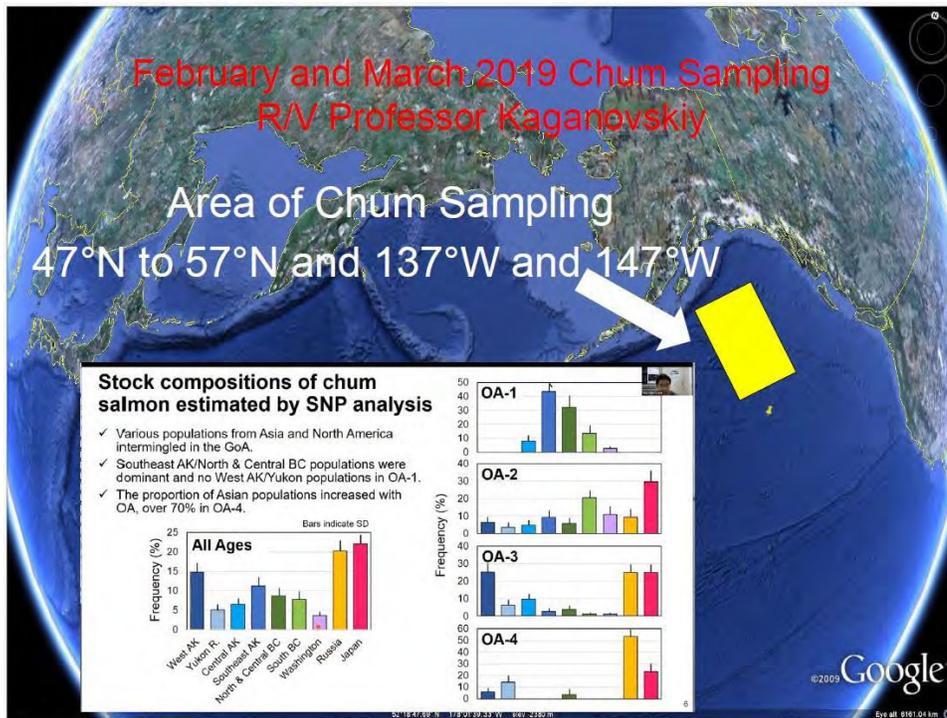
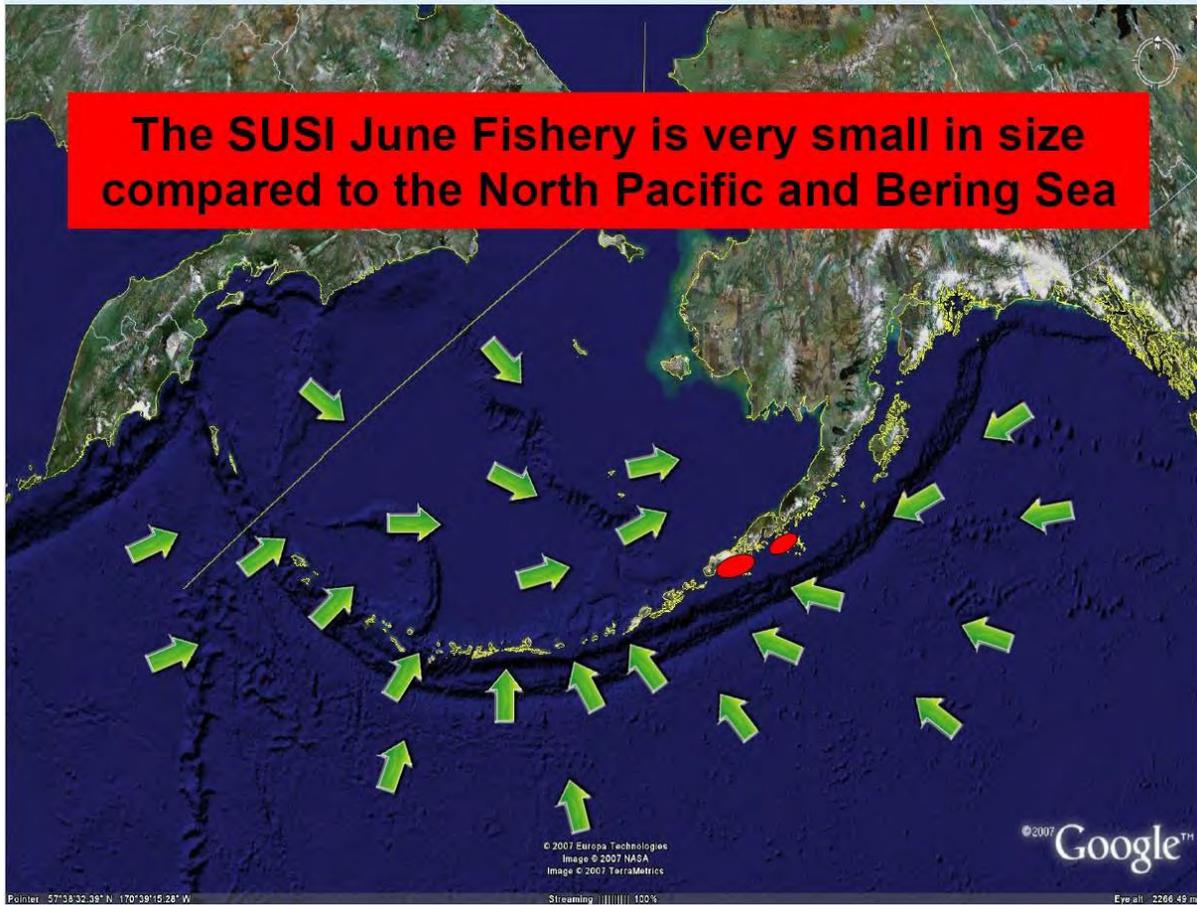


Figure 7. Stock ID of chum salmon Overwintering in GOA by new SNP baseline, Technical Report No 17 67-68 2021 (Urawa et al).



Only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing.

Figure 8. Returning mature sockeye and chum salmon migrate through all the Aleutian Passes.



In 1987, ADF&G conducted one of the largest salmon tagging studies in the South Unimak and Shumagin Islands fishery to assess the stock composition of sockeye and chum salmon harvested in the fishery. The 1987 chum tagging results indicated that very few tagged fish were later recovered in the Yukon River with recoveries heavily concentrated in Bristol Bay and nearby Alaska Peninsula systems. This study was one of many that clearly showed AYK fish were not harvested in significant numbers in the South Unimak and Shumagin Islands fishery.

FIGURE 9. 1987 ADF&G South Unimak and Shumagin Islands June Tagging Study showing tag recoveries with the Yukon River at 3.2% of the 6,323 tags recovered.

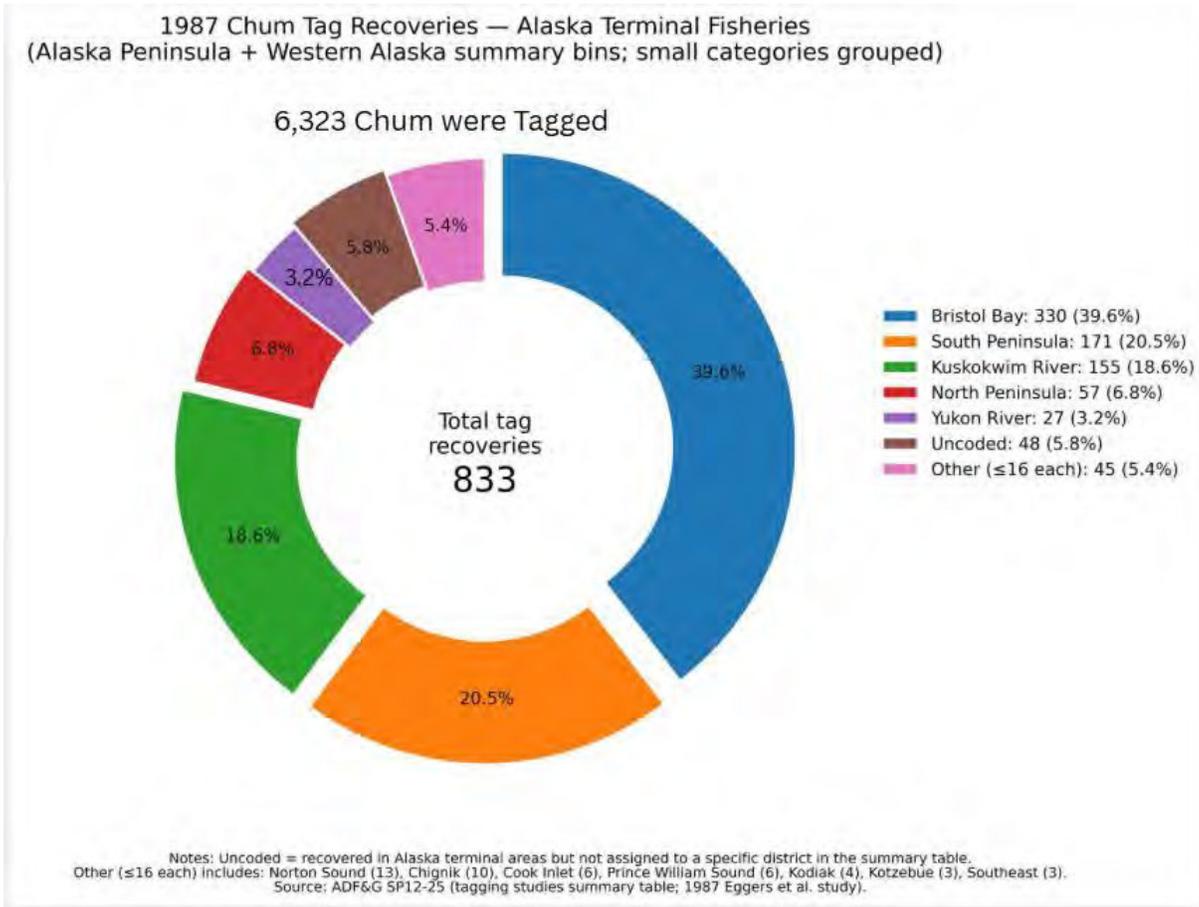
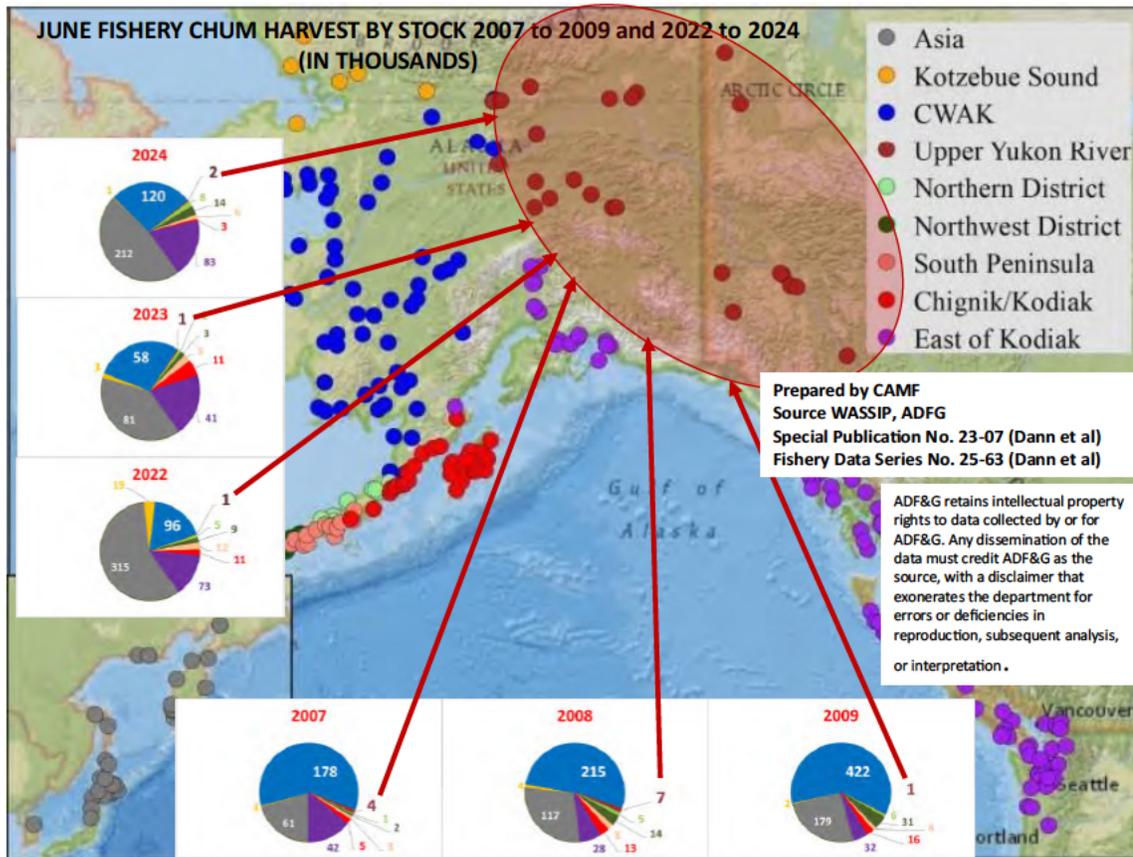


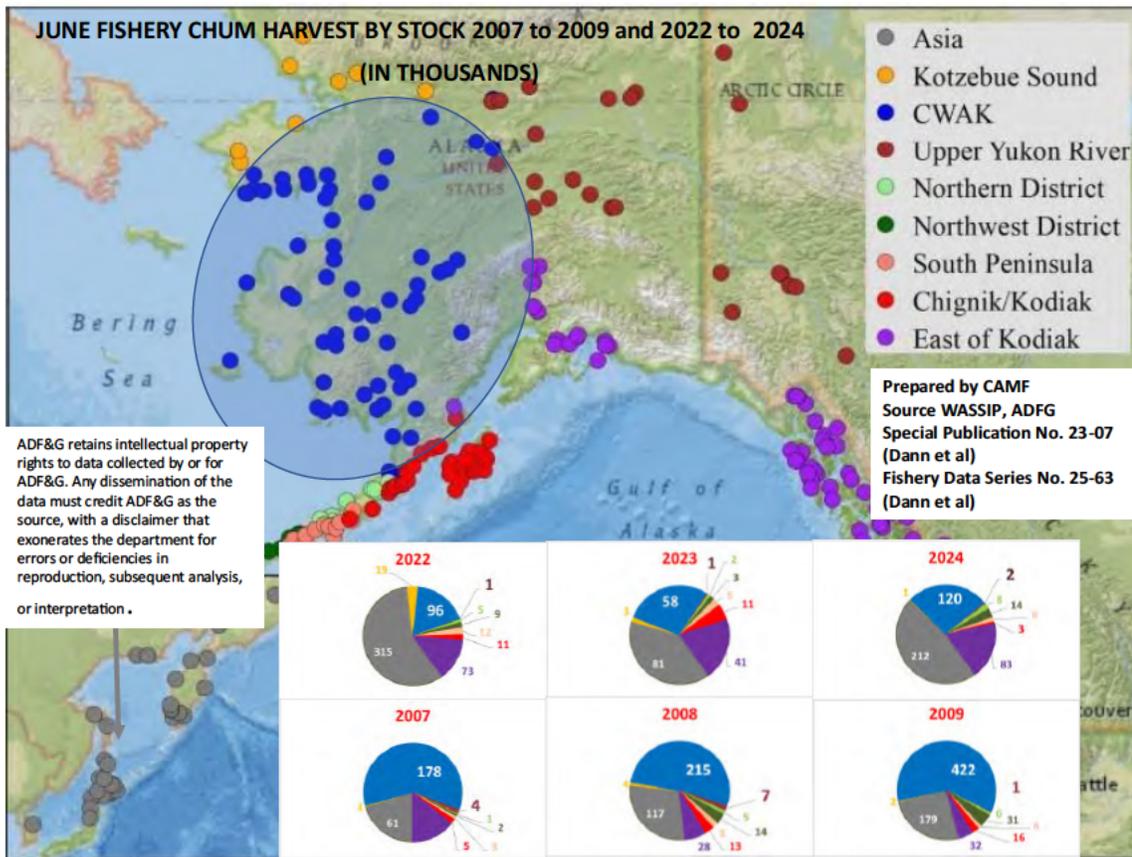
Figure 10. Upper Yukon River fall chum salmon are present in very small numbers in the June fishery.



Broader syntheses of that work also describe a substantial Asian component in the False Pass chum mixture, reinforcing that the fishery is dominated by stocks closer to the fishing area and offshore Asian fish—not Yukon.

Genetic sampling done in 2022 of chum salmon that were caught in the June South Unimak and Shumagin islands fishery shows 96,000 Central Western Alaska (CWAK which includes Bristol Bay and AYK stocks) summer chums were harvested out of a total catch of 544,000 fish. Since the CWAK includes the AYK and Bristol Bay chum salmon stocks, it is likely that the healthy Bristol Bay chum salmon runs are a significant part of that harvest. In the recent study, the percentage of June fishery harvest represented by the CWAK stock grouping was significantly lower than found in the Western Alaska Salmon Stock Identification Program (WASSIP) study and the presence of Asian origin chums in the fishery was significantly higher.

Figure 11. South Unimak and Shumagin Islands June fishery chum salmon stock of origin.



Area M fishermen have recognized the need to reduce chum salmon harvest from the high levels seen in 2021. Processors have long implemented mandatory chum pools so there is no individual incentive to target chums relative to sockeye. In 2022, the seine fleet instituted a voluntary “hot spot” reporting and stand-down system with 100% fleet support. The drift gillnet fleet also participates in the Adaptive Management Plan, and both fleets gave up several fishing days and quit early on others to avoid chum harvest. These efforts helped cut chum harvest substantially relative to 2021. The Adaptive Management Plan’s sole purpose is to reduce chum harvest in the June fishery—and it is self-imposed and implemented in coordination with the Board of Fisheries, ADF&G, processors, fishermen, and the Aleutians East Borough A chum pool and in-season reporting portal provide timely harvest information, and vessel-to-vessel communication (including via Starlink) helps the fleet avoid short-term pulses of chum salmon that can occur on a tide-by-tide basis. The gillnet fleet also continues to move geographically within the district to avoid areas of greater chum abundance. As we found in 2001-2003, these efforts would be difficult to sustain under the dramatic cuts in fishing time proposed under this proposal. It is well documented in scientific literature that chum and sockeye salmon can share similar broad migration patterns in the Pacific Ocean and Bering Sea. Maturing salmon return through multiple Aleutian passes into the Bering Sea, not just Unimak Pass or False Pass. The June fishery has low harvest rates on Bristol Bay and Western Alaska salmon stocks in large part because the fishing area is small compared to the vast size of the Pacific Ocean and Bering Sea.

Commercial fishing in this area dates back to 1906 and has never depleted any river system. The June fishery is located hundreds of miles away from river systems that claim to be impacted by this fishery. However, we know salmon stocks throughout the state are mixed in the Gulf of Alaska yet even local stocks, with intense fisheries in July



and August are healthy and not depleted. There is plenty of scientific data that shows the negative impacts to environmental issues that are impacting the Yukon River are to blame for the unfortunate decline in recent years. Other river systems like the Kuskokwim, Nushagak, and North and South Peninsula chum salmon river systems, as well as those in Chignik and Kodiak all have healthy chum salmon runs.

PROPOSED BY: Orutsararmiut Native Council

CAMF POSITION: OPPOSE

PROPOSAL 128

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Adopt chum, coho and king salmon catch thresholds that trigger time and area closures to conserve Koyukuk River salmon

Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: Koyukuk River Fish & Game Advisory Committee

CAMF POSITION: OPPOSE

PROPOSAL 129

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time to a later start date and will start on June 20 and end June 28 for drift gillnet and purse seine gear.

Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: Kawerak, Inc.

CAMF POSITION: OPPOSE

PROPOSAL 130

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce and delay commercial salmon fishing time.

Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: Chignik Intertribal Coalition

CAMF POSITION: OPPOSE



PROPOSAL 131

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time and area for purse seine and drift gillnet gear.

Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: Bering Sea Fishermen’s Association

CAMF POSITION: OPPOSE

PROPOSAL 132

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time for purse seine and drift gillnet gear.

Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee

CAMF POSITION: OPPOSE

PROPOSAL 133

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time.

Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: Chignik Advisory Committee

CAMF POSITION: OPPOSE

PROPOSAL 134

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
Amend the South Unimak and Shumagin Islands June Salmon Management Plan to increase commercial salmon fishing time for purse seine and drift gillnet gear.

- (c) The Shumagin Islands fishery takes place in the Shumagin Islands Section.
- (d) In the South Unimak and Shumagin Islands fisheries, the commissioner may establish, by emergency order, commercial fishing periods as follows:
 - (1) for set gillnet gear,
 - (A) beginning June 6, commercial fishing periods will begin at 6:00 a.m. and run 64 hours until 10:00 p.m. two days later; beginning June 10, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later;
 - (B) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on June 28;
 - (2) for seine and drift gillnet gear,



- (C) beginning June 10, commercial fishing periods will begin at 6:00 a.m. and run 88 hours until 10:00 p.m. three days later; commercial fishing will then close for 32 hours and reopen at 6:00 a.m. two days later;
- (D) notwithstanding (A) of this paragraph, the final commercial fishing period will end at 10:00 p.m. on June 28.

Chum salmon returns to the Yukon and Kuskokwim Rivers have been variable. Yukon River returns appear to be strongly influenced by environmental and in river conditions that are beyond the board’s control. Given that harvest rates in the South Unimak and Shumagin Islands fishery are typically less than 5% on CWAK chum salmon (AYK and Bristol Bay combined) available harvest_rate information does not support the claim that this fishery is the primary driver of chum salmon declines in AYK. Research by ADF&G NOAA, and other agencies has identified multiple stressors that may be affecting AYK salmon, including marine heat, warmer freshwater conditions, disease (including *Ichthyophonus*) and other environmental changes. There is extensive scientific evidence suggesting that multiple variables are contributing to recent declines in Yukon River salmon. In contrast, the neighboring Kuskokwim River has had chum salmon runs that have performed better than the Yukon River in recent years, including a sockeye salmon run that appears to be increasing. We know chum and sockeye can migrate together in the ocean, yet outcomes differ among river systems reinforcing that in-river and environmental conditions are important factors to evaluate alongside any marine interception concerns.

The South Unimak and Shumagin Islands fishery became controversial in the 1980’s when the harvest of chum salmon exceeded 1 million chum salmon. Many controversial Board of Fisheries meetings later and plenty of regulations to limit and control the harvest of chum salmon have been implemented since then, especially over the last 20+ years. The industry has worked with the Board of Fisheries, ADF&G, seafood processors, Aleutians East Borough staff who developed an in-season portal that the fishermen and department has access to compare real-time chum salmon harvests, as well as CAMF and the Area M Seiners meeting with and writing a letter to encourage the Department of Public Safety Staff to actively monitor the fishery, and Area M fishermen from all gear types working together to reduce the chum salmon harvest by using the Adaptive Management Plan in these fisheries. The fishing fleet participates in the chum pool which disincentivizes the harvest of chum salmon by individual fishermen. It is all voluntary actions by the industry to limit the harvest of chums and has been shown to work over the last several years

Figure 1. South Unimak and Shumagin Islands June sockeye and chum salmon harvests, 1975 to 2025.

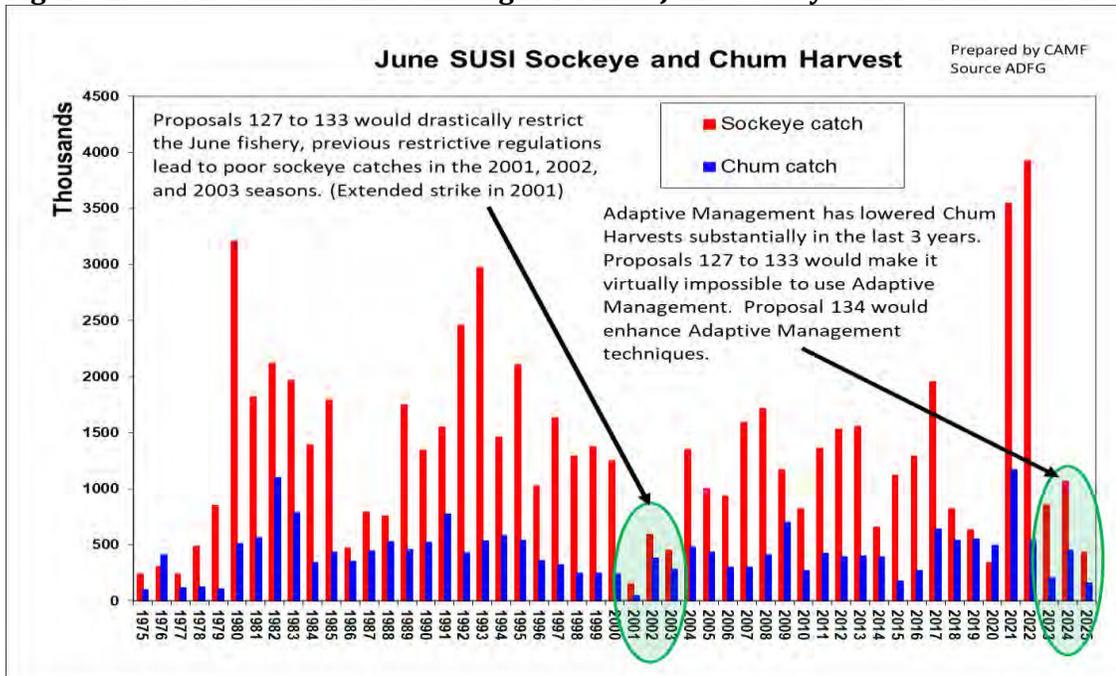
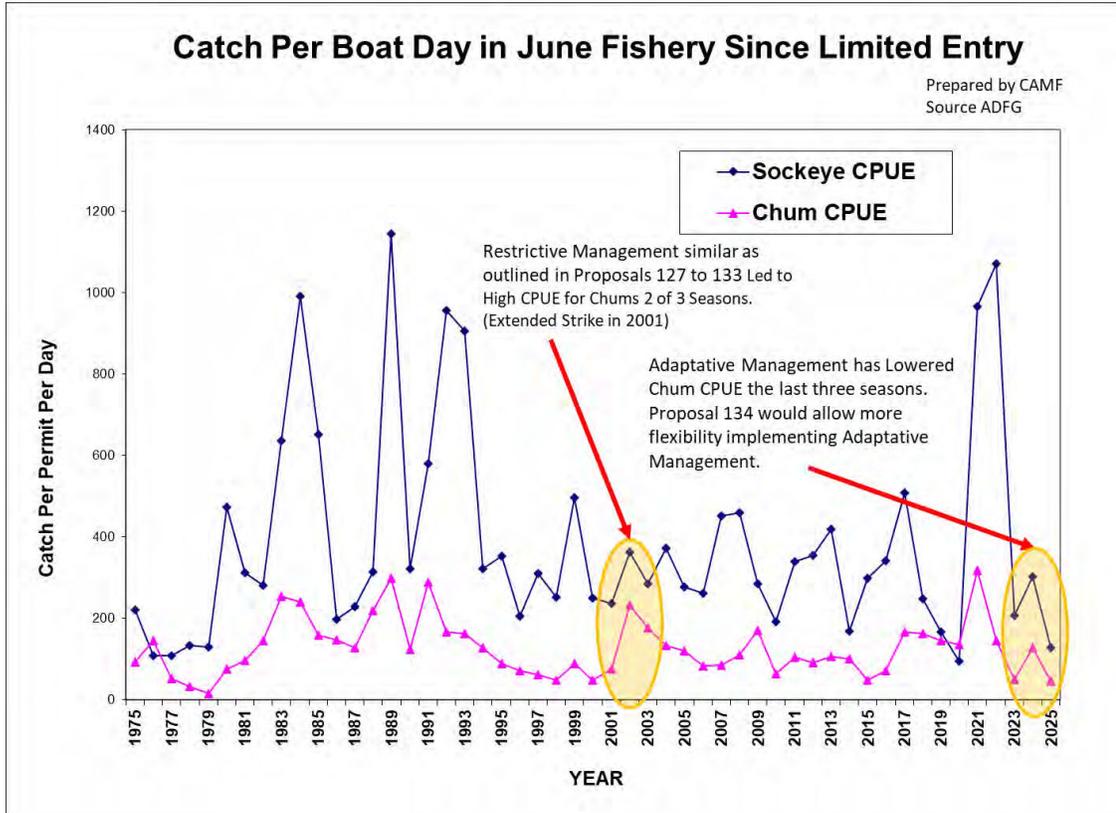


Figure 2. South Unimak and Shumagin Islands June catch per boat day 1975 to 2025.



PROPOSED BY: Area M Seiners Association

CAMF POSITION: SUPPORT

PROPOSAL 135

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Create a new regulation to provide the department emergency order authority to require non-retention of king salmon and to amend the retention provision as follows:

Current 5 AAC 09.365 (e) All salmon caught by a CFEC permit holder must be retained, and each CFEC permit holder must report the number of salmon caught, including those taken but not sold, on an ADF&G fish ticket. For the purposes of this subsection, "caught" means brought on board the vessel. This proposal would place to provide guidance to the department when it is determined that conservation is required for King Salmon. Notwithstanding 5 AAC 09.365 (e), from June 1 through October 31, if the department determines a need to conserve king salmon, the commissioner may, by emergency order, close the commercial salmon fishery and immediately reopen the commercial salmon fishery, during which King Salmon 28 inches or greater in length may not be retained, and king salmon 28 inches or greater in length taken incidentally in the commercial salmon fishery must be returned to the water unharmed.

Many seine fisheries in the state have non-retention of King Salmon over 28" in length. Most areas in the state have low populations of King Salmon and since seine fisheries across the state often have non-retention rules it seems prudent to allow king salmon to be released. Past genetic stock identification for King Salmon showed about 64% of the fish harvested in the June fishery in 2014 were from fish from British Columbia and the West Coast of the United States. We support the ability of the seine fleet to release live King Salmon. We all know the situation that most King



Salmon stocks are in and this is the prudent action to allow and help conserve fish. Other seine fisheries around the state require non-retention and has prevented unnecessary harvesting of fish.

PROPOSED BY: Area M Seiners Association

CAMF POSITION: SUPPORT

PROPOSAL 136

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
5 AAC 09.330. Gear. Amend the South Unimak and Shumagin Islands June Salmon Management Plan to close the fishery from June 7 through June 28.

This proposal closes the June fishery. Comments for this proposal are the same as in Proposal 127.

PROPOSED BY: John H. Lamont Jr.

CAMF POSITION: OPPOSE

South Alaska Peninsula Salmon Post-June Management Plan (9 proposals)

PROPOSAL 139

5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.
Amend the Post-June Salmon Management for the South Alaska Peninsula to increase commercial salmon fishing periods for set gillnet gear.

CAMF supports action that will benefit Area M fishermen.

PROPOSED BY: Edgar L Smith

CAMF POSITION: SUPPORT

PROPOSAL 140

5 AAC 09.200. Description of districts and sections.
5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.
Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to reduce commercial salmon fishing area and modify existing Districts and Sections in the South Alaska Peninsula.

We oppose this proposal as it reduces and limits fisheries in Area M without justification.

PROPOSED BY: Axel S Kopun

CAMF POSITION: OPPOSE



PROPOSAL 141

5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to enforce king salmon caps with reductions in commercial salmon fishing time in the South Alaska Peninsula.

The test fishery has been around for decades and serves ADF&G in making management decisions.

PROPOSED BY: Chignik Advisory Committee

CAMF POSITION: OPPOSE

PROPOSAL 142

5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Amend the Post-June Salmon Management Plan for the South Alaska Peninsula to allow commercial salmon fishing time and area in the South Alaska Peninsula from August 1 through August 31 as the commissioner may open the fishery by Emergency Order by specific or multiple gear types for concurrent or non-concurrent periods. Currently the Department must open all gear types concurrently which can lead to over harvest, allowing the Department the flexibility to use specific gear types or multiple gear types depending on section (seine, set or drift gillnet) during different run scenarios. This would improve run information in times of inclement weather by allowing the area biologist the flexibility of selecting the appropriate time and area for a specific gear type or types to get run information without jeopardizing weak stocks and giving the fleet and the processors opportunity to remain active.

This proposal will assist the department with managing the fishery in August by allowing fishery openings per gear type if they feel necessary or to allow smaller commercial fishery openings by gear to assess run strength without the entire fleet of all 3 gear types fishing.

PROPOSED BY: Area M Seiners Association

CAMF POSITION: SUPPORT

PROPOSAL 143

5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Modify the department’s test fishery protocol found in the Post-June Salmon Management Plan for the South Alaska Peninsula.

The test fishery has been around for decades and serves ADF&G in making management decisions.

PROPOSED BY: Gale K. Vick

CAMF POSITION: OPPOSE

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PROPOSAL 144

5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Amend the Post-June Salmon Management for the South Alaska Peninsula to increase commercial salmon fishing periods for set gillnet gear

CAMF supports action that will benefit Area M fishermen.

PROPOSED BY: Patrick Brown, Sand Point AC Chair

CAMF POSITION: SUPPORT



PROPOSAL 145

5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. Amend the Post-June Salmon Management for the South Alaska Peninsula to allow commercial salmon fishing time and area from August 1 through August 31 while the commissioner MAY open by Emergency Order the fishery by specific or multiple gear types for concurrent or non-concurrent periods. Currently the Department must open all gear types concurrently which can lead to over harvest, allowing the Department the flexibility to use specific gear types or multiple gear types depending on section (seine, set or drift gillnet) during different run scenarios. This would improve run information in times of inclement weather by allowing the area biologist the flexibility of selecting the appropriate time and area for a specific gear type or types to get run information without jeopardizing weak stocks and giving the fleet and the processors opportunity to remain active.

This proposal will assist the department with managing the fishery in August by allowing fishery openings per gear type if they feel necessary or to allow smaller commercial fishery openings by gear to assess run strength without the entire fleet of all 3 gear types fishing.

PROPOSED BY: Area M Seiners Association

CAMF POSITION: SUPPORT

Commercial Salmon Gear (7 proposals)

PROPOSAL 147

5 AAC 09.331. Gillnet specifications and operations. Reduce maximum gillnet depth to 70 meshes from 90 meshes. This proposal seeks to reduce the gillnet depth from 90 meshes to 70 meshes in the South Peninsula fisheries. Reducing gillnets by 20 meshes will be costly for every fisherman and without any benefit for migrating chum salmon. This proposal has been addressed numerous times in the past without merit. Reducing gillnet depth by 5' in depth in the South peninsula June fishery where often the gillnet fleet fishes in deep water that is often 300' in depth will not have a measurable benefit for migrating chum salmon in the AYK. Also the harvest rate on CWAK (which includes AYK and Bristol Bay chum salmon) chums in this fishery is small.

A net cost between \$3,000 and \$4,000 dollars for just the web and hangings, including lines and corks that cost increases to the \$6,000 to \$7,000 range. Almost all permit holders have more than one net which are used for backups and ones that have different mesh sizes. With a 160 drift gillnet permits in Area M of which potentially about 155 having fished in the June fishery in the past, the price to the fleet could 1 million dollars.

PROPOSED BY: Charles Lean

CAMF POSITION: OPPOSE

PROPOSAL 148

5 AAC 09.332. Seine specifications and operations.

Amend the seine specification to reduce the allowable size gear as follows:

Purse seines or hand purse seines may not be less than 100 fathoms nor more than 250 fathoms in length. A purse seine or hand purse seine may not exceed 325 [375] meshes in depth. Seine mesh may not be more than three and one-half inches, except that the first 25 meshes above the leadline may not be more than seven inches.

Reducing the depth of seine gear will be costly and without any measurable benefit to chum salmon in the AYK.

PROPOSED BY: Western Interior Alaska Subsistence Regional Advisory Council

CAMF POSITION: OPPOSE



PROPOSAL 150

5 AAC 09.331. Gillnet specifications and operations.

Amend gillnet specifications to allow the use of monofilament in a set gillnet in the Unimak, Southwestern, South Central, and Southeastern Districts (South Peninsula), the gillnet web may be single filament.

Monofilament gillnet web is used through many fisheries in Alaska. It can be a cost savings and also can be helpful in reducing algae buildup and potentially be easier to clean. CAMF supports proposals that benefit Area M fishermen.

PROPOSED BY: Edgar Smith

CAMF POSITION: SUPPORT

PROPOSAL 151

5 AAC 09.331. Gillnet specifications and operations.

Amend gillnet specification to reduce the allowable set gillnet gear.

CAMF Opposes proposals that would reduce or limit commercial fisheries in Area M.

PROPOSED BY: Chignik Intertribal Coalition

CAMF POSITION: OPPOSE

PROPOSAL 152

5 AAC 09.332. Seine specifications and operations.

Amend the seine specification to reduce the allowable size of purse seine gear.

CAMF Opposes proposals that would reduce or limit commercial fisheries in Area M.

PROPOSED BY: Chignik Intertribal Coalition

CAMF POSITION: OPPOSE

PROPOSAL 153

5 AAC 09.331. Gillnet specifications and operations.

Amend the gillnet specifications to allow the use of monofilament web for set gillnet gear.

Monofilament gillnet web is used through many fisheries in Alaska. Monofilament gillnet gear can be a cost savings and also can be helpful in reducing algae buildup and potentially be easier to clean. CAMF supports proposals that benefit Area M fishermen.

PROPOSED BY: Patrick Brown, Sand Point AC Chair

CAMF POSITION: SUPPORT

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PROPOSAL 154

5 AAC 27.610. Fishing seasons and periods for Alaska Peninsula-Aleutian Islands Area.

Establish a summer herring food and bait fishery, as follows:

5AAC 27.610 (f) in the Sand Point, Pavlof & King Cove Districts, herring may be taken from July 16 through September 15 (food and bait season) only during fishing periods established by emergency order.

This proposal will establish a summer herring fishery for food and bait parts of the South Peninsula. The South Peninsula has had commercial herring fisheries in the past but has not since Herring resources in Bristol Bay and the Alaska Peninsula used to have large scale commercial fisheries that no longer occur due to market volatility of herring. These populations are healthy and stable and utilizing herring again in the food and bait herring is warranted and would help local fisherman and communities.

PROPOSED BY: Taylor Lundgren

CAMF POSITION: SUPPORT

PROPOSAL 188

5 AAC 27.865. Bristol Bay Herring Management Plan.

Allocate 15% of the unharvested Togiak sac roe herring guideline harvest level to the Dutch Harbor food and bait herring fishery.

This proposal will allocated 15% of the Togiak sac-roe herring to the Dutch Harbor food and bait fishery. The Dutch Harbor herring fishery harvests Togiak herring after they spawn in Togiak. The Togiak herring resource is no longer utilized and herring resources in Bristol Bay and the Alaska Peninsula use to have large scale commercial fisheries that no longer occur due to market volatility of herring. These populations are healthy and stable and utilizing herring again in the food and bait fishery in Dutch Harbor would at least utilize a portion of the resource.

CAMF Supports this opportunity for herring fishermen in Area M.

PROPOSED BY: Alaska Board of Fisheries.

CAMF POSITION: SUPPORT

Sport Fisheries (7 proposals)

PROPOSAL 155

5 AAC 65.022. Special provisions for bag, possession, and annual limits, and methods and means in the Alaska Peninsula and Aleutian Islands Area.

Amend dates that bait is allowed and a single-hook is required in the King Salmon and Bear Rivers, as follows:

5 AAC 65.022(b)(2) is amended to read:

(2) may use only an unbaited, single hook, artificial lure or fly from January 1 through July 25.

This proposal seeks to clarify the regulations that was adopted in 2023 for non-retention of King salmon in the King Salmon and Bear Rivers.

PROPOSED BY: ADF&G

CAMF POSITION: SUPPORT



PROPOSAL 156 (shown) and PROPOSALS 157-160

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

Prohibit retention of king salmon in the Cinder, Meshik, and Black Hills rivers, and North Creek, as follows:

(1) king salmon:

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

- (i) 20 inches or greater in length; no retention on the Cinder, Meshik, Black Hills, and North Creek rivers except in the Chignik River the bag and possession limit of two fish; annual limit of five fish; a harvest record is required as specified in 5 AAC 75.006;]
- (ii) less than 20 inches in length; bag and possession limit of 10 fish; no annual limit;

Proposals 156-160 are all trying to make king salmon sport fishing non-retention of adult fish to some level. The authors, most of them are lodge owners/users on the North Peninsula, have all discussed the issue as a group with ADF&G Sport Fish Division Staff and with the Nelson Lagoon AC and agreed that there should be some protection for King salmon by providing non-retention on drainages that still allow retention of King salmon. Many of the other river systems with King salmon runs such as the Nelson, King Salmon, Bear, and Sandy Rivers all have some form of non-retention of King salmon, but Sandy River does allow retention of 1 fish per day. ADF&G only actively has monitoring of the Nelson River with a salmon counting weir and BEG of 2,400-5,000 fish, while other rivers are all assessed using aerial surveys which are very limited. In 2025, the Sandy River weir, which has been operational since 1994 was not operated due to funding constraints, yet aerial surveys showed about 1,100 King salmon in the river which was one of the better escapements ever observed. Retaining King salmon in river systems with low abundance and unmonitored systems such as Cinder, Meshik, Black Hills, and North Creek with no available harvest data or aerial surveys which will be surveyed less in the near future is not prudent with the general overall statewide concern for King salmon. Having retention of King salmon on these North Peninsula systems will allow lodges that fly in from the Bristol Bay area where non-retention is in effect, to harvest King salmon on these rivers with limited escapement data. In 2024 there were about 4,200 King salmon that escaped into all North Peninsula river systems, and according to ADF&G Sport Fish survey data, which includes Chignik, there were 3,706 King salmon caught and released by anglers. In 2023, about 4,700 King salmon escaped and 3,159 were released. Obviously, a large number and percentage of the King salmon escapement are being caught on hook and line and released and are readily available to sport fishermen and should be protected by non-retention.

PROPOSED BY: Multiple Authors

CAMF POSITION: SUPPORT

PROPOSAL 161

5 AAC 09.XXX. New Section.

Adopt an Alaska Peninsula king salmon management plan, as follows:

Adopt a King Salmon Management plan for streams located on the Alaska Peninsula and are a part of the Bering Sea drainage that do not currently have a plan in place and have an active sports or subsistence or personal use fishery associated with them.

Having drainage wide King salmon management plans is not realistic although the concept of this proposal is to protect and conserve King salmon which we support. The department does not have the tools to put a King salmon



management plan(s) because current stock assessment and monitoring tools are not sufficient and would be cost prohibitive. Recent ADF&G funding cuts in 2025 forced the closure of the Sandy River weir which mainly counted sockeye salmon since implementation in 1994 and in about 25% of the years it was operational had escapement levels of over 100,000 sockeye salmon and the department clearly does not have the financial resources to implement King salmon plan(s). Creating a new king salmon management plan for the multiple river systems on the North Peninsula that have King salmon runs will require the department and the board to evaluate the current sport, commercial, and subsistence fisheries and develop regulations, bag, possession, and annual limits, and escapement goal ranges for these systems. Stock identification work and population estimates will need to be performed. Commercial fisheries have always had restrictions on the weekly fishing periods when King salmon abundance is at its peak. North Peninsula King salmon river systems are considered healthy and we know that is not the case throughout the state. Proposals 156-160 can be amended to provide the protections necessary in the Sport Fishery to prevent harvest and allows local lodges to continue sport fishing for King salmon while still protecting the healthy King salmon runs with non-retention.

PROPOSED BY: Nanci Morris Lyon

CAMF POSITION: SUPPORT

END

Jared Danielson

Area M Gillnetter / CFEC Permit Holder

February 2, 2026

Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

Email: dfg.bof.comments@alaska.gov

Re: Alaska Peninsula Proposals – South Peninsula / North Peninsula (2025–2026 Cycle)

Dear Madam Chair Carlson-Van Dort and Board Members:

Proposals I Support: 107, 113, 114, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, 154

Proposals I Oppose: 108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, 143, 147, 148, 152

I am submitting these comments as an Area M gillnetter and CFEC permit holder.

Regarding the North Peninsula, I strongly oppose Proposal 116. This proposal would restrict the North Peninsula outside beach by confining fishing opportunity to within 1.5 miles of shore and by imposing mandatory fishing windows. These changes are unnecessary in an abundance-based management system that already provides harvest opportunity on surplus fish while meeting escapement goals. Proposal 116 would reduce management flexibility, increase the likelihood of surplus escapement, and create serious safety concerns by forcing larger, deeper-draft drift vessels into shallow, congested nearshore waters—especially during onshore winds or building seas—without demonstrating a measurable conservation benefit.

Regarding the South Peninsula, I oppose any proposal that seeks to impose additional restrictions on Area M beyond those already in place. Over the last several meeting cycles, Area M fishermen have

already absorbed substantial cuts through lost fishing time, lost fishing area, harvest caps, and other regulatory limits. In addition, the fleet has implemented an adaptive management program that includes voluntary stand-downs when chum ratios are not favorable—even during periods when fishing is open and legal. This approach is working: chum encounters in Area M have trended down as fishermen actively change behavior on the water. It is a practical conservation tool that reduces impacts in real time and deserves recognition as part of the solution.

Thank you for your time and consideration.

Respectfully,

Jared Danielson

Public Comments to the Alaska Board of Fisheries

Alaska Peninsula Proposals (2025–2026 Cycle)

February 2, 2026

Alaska Board of Fisheries | PO Box 115526 | Juneau, AK 99811-5526 |
dfg.bof.comments@alaska.gov

From: Kurt Danielson, Area M Drift Gillnetter / CFEC Permit Holder

Madam Chair Carlson-Van Dort and Members of the Board:

My positions on the proposals are:

- **Support:** 107, 113, 114, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, 154
- **Oppose:** 108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, 143, 147, 148, 152

North Peninsula — Proposal 116: I’m against it. It would crowd everybody into the beach line—shoreline to 1.5 miles—and it would force set “windows” on top of that. That’s not how you run an outside-beach fishery.

My name is Kurt Danielson. I’ve fished in Area M since the late 1970s, starting on my dad’s boat alongside my two older brothers. I’m a drift gillnetter and CFEC permit holder.

A lot of our boats are bigger and draw more water. Shoving the fleet shallow and tight is a safety problem. When the wind comes onshore and the sea stands up, you need room to work. Proposal 116 takes that room away.

The department already manages by abundance. When there are surplus fish, we get opportunity. When escapement needs to happen, the department can shut it down. Fixed windows tie their hands. They can also push fish past what’s needed—surplus escapement—while we sit tied up.

South Peninsula: I’m also against any new cuts on Area M. We’ve already given up plenty over the last few cycles—time, area, and opportunity. Another round of restrictions is too much.

We're not ignoring conservation. We've been doing stand-downs on our own when chum ratios aren't right—during legal openings. That's fishermen taking action in real time. And chum encounters have been coming down because guys are changing how they fish.

Please keep it simple: don't pile more restrictions on a fishery that's already taken a lot. And don't force unsafe nearshore crowding on the outside beach.

Respectfully,

Kurt Danielson

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Juliet Delaney. I live in the Mat-Su Valley, and my family fishes in Area M.

Further restrictions mean less fish in my freezer and fewer opportunities for families who rely on these fisheries. While I may not see all of the impacts directly, I know that small rural coastal communities are hit the hardest when fishing opportunity is reduced.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Respectfully,

Juliet Delaney
Mat-Su, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Troy Denkinger. I have been an Alaska fisherman since 1983, started captaining my own vessel in 1991, and have been seining in Area M for the past six years. I own and operate a seine vessel in this fishery.

The June sockeye fishery is a critical part of our season. In 2022, approximately 70% of our gross revenue came from June sockeye harvests. I have a five-person crew, all Alaska residents, who depend on salmon fishing to support their families. Lost fishing opportunity directly harms their ability to do so and negatively impacts local businesses and communities.

Over the last three years, seiners have implemented the Adaptive Chum Management Plan, significantly reducing fishing opportunity while successfully allowing chum salmon to pass during periods of high abundance. Starting the season earlier under this plan would help recover some of the opportunity already lost.

Last season, early test fisheries showed high sockeye abundance with very few chums, yet we were unable to fish. Days later, when fishing began, sockeye abundance dropped and we stood down again to protect chum. This illustrates the need for flexibility, not further restriction.

Salmon runs vary by river system, climate and habitat stressors cannot be regulated away, and removing management flexibility makes mixed-stock fisheries harder to manage.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Respectfully,

Troy Denkinger
King Cove & Sitka, Alaska


Submitted by: Mary Donaldson

Community of Residence: Kodiak, Alaska

I am writing on behalf of Area M which is my homeland. My family is from Belkofski but have since moved to King Cove, Alaska. My father and his family have always fished Area M.

I am writing to request not changing anything out there as this is one of the most important income for everyone that lives in the area. I request that you look at other sources of fishing that happen close by that could affect salmon.

Please take all inquiries with the upmost care as you are dealing with livelihoods of my people who live in Area M. Thank you, Mary Jane Donaldson

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Charley Dushkin. I was born and raised on the ocean and am local to Alaska waters, with family and community ties to King Cove, Sand Point, Dutch Harbor, and Akutan.

I am writing to share my concern that current and proposed restrictions are holding me back from being able to fully participate as a commercial fisherman. The State of Alaska's management decisions have already had real impacts on my home and on my people, limiting opportunity and creating barriers for those trying to build or sustain a fishing livelihood.

Further restrictions would only deepen these impacts on small rural coastal communities. Area M has nothing to do with Arctic–Yukon–Kuskokwim fisheries, and the June Area M fishery is not a primary driver of chum and Chinook declines in those systems.

I ask the Board to recognize the distinction between regions and to consider the cumulative effects these policies have on individuals, families, and communities whose lives are rooted in Alaska's fisheries.

Thank you for your time and consideration.

Respectfully,

Charley Dushkin
King Cove / Sand Point / Dutch Harbor / Akutan



Submitted by: Charley Dushkin
Aleut Corporation

Community of Residence: Anchorage

Hello,

My Name is Charley Dushkin. A life long Alaskan and commercial fishermen. Local to the coast of Alaska in almost every bar and port.

Since 2019 I havn't been able to go back to work because I have been trying to appeal cases in the Department of Justice.

I had recieved an email from the Aleut Corporation which I'm a shareholder and was to comment about Area M fisheries. I have fished every part of those waters and every season. Since 2019 I have been on land and have watched communities deteriorate because of the closure of industries, not just in my home but in many others across Alaska. Whether it's because of poor management of the industry or the lack of knowledge, The state of Alaska and the Alaska Department of Fish and game needs to see that its hurting the home to many free commercial fishermen and a way of one's culture.

King Cove Alaska where I'm from was an international workforce. Many people from many countries had migrated to our beautiful free country, some became apart Area M, some called it home, and some see what I see the poor management of how the industry works here in Alaska.

Closing fisheries and shutting down canneries throughout Alaska is wrong, its the first thing some migrants first learn about the United States, work hard, earn a work visa and then obtain their citizenship as a free American.

I know once this message is recieved I will be Judged by my criminal record, the State doesnt see the parts other countries have seen, the hard work ethic, the friendship earned from other countries, and a way of life from growing up in Area M Fisheries.

I hope that message helps the State of Alaska see a different perspective of how I see a free country I grew up in.

Thank you
Charley Dushkin


Submitted by: Charley Dushkin
Aleut Corporation

Community of Residence: Anchorage

I had sent a comment earlier today and hit the support button.

I oppose stricter regulations on Area M fisheries.

Submitted by: William Dushkin Jr

City of Sand Point, Pauloff Harbor Tribe

Community of Residence: Sand Point

To Members of the Alaska Board of Fisheries,

My name is Willian Nick Dushkin Jr, and I live in Sand Point Alaska. I am submitting my comments today is strong jpposition to any and ALL proposals that would hurt our community's by reducing our fishing time and our opportunity to make a living fishing Area M. Any additional loss of fishig time would do and HAS DONE long lasting damage and harm to not only our businesses and families, but all our communities as well.

I have seen and experienced this impact of loss of fishing time in our communities by living it every day. I have grown up the son of an original permit holder of the limited entry program. This program was put in place to help save these community's and there people by giving them a way of life, or so we thought. The state knew what it was doing because they knew one day they would have a value and then we end up right where we are right now, the system that was suposed to save the community's and fisheries is killing off one, the communities. Even though it is a different argument i believe it could eventually be a part of the solution. I remember my father William N Dushkin Sr fighting this same fight in the late 80s and all through the 90s and in to the new millennium, and the results have all been the same with Area M loosing fishing time is some form or another chum caps/shortened openers so on and so on. So I believe it is time to think out of the box and get ALL of our NATIVE organizations together and see if we could get the last of the Local/Native owned permits to fish for 3 weeks before the other permits and boats could come fish say form June 7-21st. Less boats and nets in the water yet more time and income for the communities and their residents,

Fishing weather it be commercial or subsistence is our primary food and economic source throughout the region. All of our family members, families, small businesses, and our community as a whole rely on these fisheries. Please HELP SUPPORT our communities and their families fight to get justice and a fair and balanced fisheries management plan that helps our communities thrive instead of helping them wither away. Our local economies all across the region rely on our way of life and all our cultural traditions all across the vast fishing industry.

Thank you for the time and Consideration,

William Dushkin Jr



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I started fishing with my dad in the summer of 1986 when I was about three years old. I have been part of this industry for almost as long as I can remember, and my family has fished this region since before Alaska even became a state. Our family name is literally on the map in the middle of Area M.

For decades, Area M communities have been fighting to survive. Historically, communities up and down the peninsula have flatlined when fisheries disputes escalate, and it's the local Native villages and their people who get hurt the worst. We are surrounded by ghost towns across the Aleutians, and fisheries or processor disputes are often the common denominator. We need out-of-the-box thinking because what we've been doing is not working.

My family is hanging by a thread as it is. Between piling expenses, boat and mechanical problems, and the reduction in fishing time, we are struggling to survive. Salmon fishing is the primary source of income throughout Area M. If we lose any more time, I don't know how our families and communities can make it.

Because fishing is our main source of income, any further threat to that income will have drastic impacts across the peninsula. Without income, people will move away, our schools will get smaller, utilities will rise, and local services and businesses will collapse because people won't be able to afford them.

Over the past three years, the damage is already being felt across the region, even for people who don't fish full time. People are leaving, and in desperate times, depression and addiction rise. I have attended more memorial services in the last ten years than in the first thirty. Some may say it's unrelated, but anyone living it knows it is connected. More boats are coming up from down south and spending as little time as possible in our harbors and stores, which further weakens the local economy.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system, and not all poor runs share a single cause. Further restrictions would hit small rural coastal communities hardest.

The Area M June salmon fisheries are the lifeblood of our people and communities. If we keep squeezing time out of this fishery, not only will the fishery die, but the communities that depend on it will die as well.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

William Dushkin Jr
Sand Point / False Pass, Alaska



Submitted by Jeremiah Elgarico

February 3, 2026

I grew up in King Cove, AK, and those waters have always been part of my life and my family's history. My grandfather, Simeon Dushkin, was a lifelong fisherman who worked until doctors told him he couldn't. My mother, her siblings, and later we grandchildren—once we were old enough—became deckhands alongside him. That upbringing built our values: hard work, family support, and the ability to shape our own future through our fisheries.

Because of that, the thought of shutting down commercial fisheries in our region is devastating. These fisheries have sustained our families and communities for generations. They are not only an economic resource but also a foundation of our culture and identity.

What we need—and what our communities deserve—is clarity supported by transparent, science-based data.

- Where is the evidence demonstrating that closing our fisheries is the right path?
- Why is bycatch from trawlers publicly acknowledged, yet the proposed solution seems to target our long-established fisheries instead of addressing those larger impacts?
- Why are we being asked to carry the burden when the issues affecting salmon survival are broader and more complex?

The post shared highlights key factors that should be part of this discussion—including decades of interception by offshore fleets and the significant influence of climate-driven environmental changes on salmon survival. These realities must be acknowledged when decisions are being made.

A constructive solution should involve:

1. **Transparent release of all relevant biological, bycatch, and escapement data** for public review.
2. **Evaluation of all fisheries equally**, including trawlers and offshore fleets, so that the burden of conservation is fairly distributed.
3. **Inclusion of local communities and generational fishers** in developing management plans—people who understand these waters and have protected them for decades.
4. **Science-first decision-making**, not changes driven by emotion, pressure, or incomplete information.

Our fisheries have been part of our lives and our economy for decades. They are essential to our communities' survival and future. We are simply asking that decisions impacting our livelihood be grounded in full transparency, accurate data, and a fair assessment of *all* factors affecting salmon—not only ours.



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Chloe Erikson, and I am from Sand Point, Alaska, in the Aleutians East Borough. I am submitting this comment in opposition to additional restrictions on Area M fisheries because of the very real impacts these decisions have on families and communities like mine.

I am no longer able to live in my hometown due to a lack of jobs and the extremely high cost of living, especially while raising three young children. Fishing communities like Sand Point depend on stable fishing opportunities to sustain families and allow people to remain in the places they call home. When those opportunities disappear, families are forced to leave—not by choice, but by necessity.

Further restrictions would be devastating for our community. Families would have to move away, which would directly affect schools through declining enrollment. Sand Point is a commercial fishing village with a food-size fleet, and the fishery is the foundation that supports our economy, our schools, and our way of life. When fishing opportunities are reduced, the ripple effects are felt everywhere.

Area M is not the primary driver of chum and Chinook declines, and runs vary by river system. Placing further restrictions on small coastal communities will not solve larger environmental or climate-related challenges but will instead accelerate the decline of villages that are already struggling to survive.

Please consider the long-term consequences of these decisions on families, children, and communities that depend on fishing not just for income, but for stability, identity, and survival.

Thank you for your time and consideration.

Respectfully,

Chloe Erikson
Sand Point, AK



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I am a community member of King Cove, a member of the Native Village of Belkofski, a past fisherman, and a subsistence user.

With cuts to an already reduced season, it will be devastating to our fishermen and women and the families that depend on it. It is hard enough to sustain a fishing family in our area, not only because of reductions but also because of our subsistence way of life. Many families depend on that income and the fish itself to make it throughout the year. Between closures and stand-downs, our fishermen and women are gone longer due to fuel costs and lack of fishing opportunities.

We have already taken a major blow with the closing of our cannery. We still have a fleet of fishermen who choose to be here even though they must travel farther to deliver their catch. The number of children in our school is declining, and young people are leaving to find work elsewhere.

My husband was a fisherman until our cannery closed. Before that, he fished Area M for most of his fishing career. Between reduced fishing time and stand-downs in June, he was gone, sitting at anchor making no money, away from his family. That is the reality for our fleet—away from home, with no openers, or repeatedly standing down to prove time and time again that Area M is not the problem.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and can't be "regulated away."

Fishermen in Area M have already taken repeated hits. Science has shown that Area M is not the problem. Fishermen already work with reduced fishing time and coordinate with one another to keep chum catch down by standing down when counts are high. That has been proven. When was the last time the season closed due to high chum counts? Fishermen in Area M respect the salmon and the upriver communities that depend on returns. They fight every year for a fishery they maintain by working with science and with each other.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Lynn Farr


King Cove, AK

AMY AND JACK FOSTER JR.
Jack Foster III
[REDACTED]
SAND POINT, ALASKA [REDACTED]

February 2, 2026

Alaska Department of Fish and Game
Boards Support Section – Alaska Board of Fisheries
P. O. Box 115526
Juneau, Alaska 99811-5526

ATTN: Alaska Board of Fisheries

Marit Carlson Van Dort, Chair
Gerad Godfrey
Mike Wood
Oliva Henaayee Irwin

Greg Svendsen
Tom Carpenter
Curtis Chamberlain

PROPOSAL 119

5 ACC 09.360. Southeastern District Mainland Salmon Management Plan.
Amend the Southeastern District Mainland Salmon Management Plan to increase commercial salmon fishing time for set gillnet and seine gear as follows:

Amend the Southeastern District Mainland Salmon Management Plan to allow commercial salmon fishing with set gill net gear and after July 11, purse seine gear concurrent to open commercial salmon fishing periods in the Chignik Management Area, as follows:

Revise the Southeaster District Mainland Management Plan to allow commercial salmon fishing with set net gear and after July 11 seine gear concurrent to the Chignik Area Commercial Salmon Fishery as follows:

WHO WE ARE

My family is of Aleut Native Unangan descent, mixed with Scandinavian and Russian roots. My husband and I trace our heritage to the historically significant Indigenous villages of Unga and Squaw Harbor, both of which are now abandoned. Our ancestral roots extend to Unga, Squaw Harbor, Pirate Cove, and Korovin Island, while Jack's family originates from Sanak Island. These homelands possess a rich cultural legacy closely connected to the abundant salmon populations and diverse marine life, resources that supported both subsistence and commercial activities. Due to economic pressures, former residents of these villages along the Alaska Peninsula and the Shumagin Islands were compelled to relocate, primarily settling in Sand Point and other communities.

My ancestors and the native Unangax people have been fishing for salmon since ancient times. Catching salmon for myself began at age 12 on my father's boat and later continued as an adult alongside my husband. Jack has fished since childhood, gaining over 60 years of experience with all three types of salmon fishing gear: drifting, seining, and set netting. In 2000, Jack transitioned from seining to set net fishing, and a few years later, his wife and their three children joined him. Not all family members fish on our vessel today. Jack III began fishing when he was young, spending summers seining with his father before eventually set netting for many consistent years.

SEDM – SOUTHEAST DISTRICT MAINLAND

This relatively small area, located just a few short miles from my home in Sand Point, has been closed to the local fishing fleet for many years. Despite centuries of fishing by our ancestors, strict management plans now severely restrict fishing on the South East District Mainland. The emergency order to close potential areas of the South Alaska Peninsula further limits viable fishing efforts, negatively affecting the SEDM fishery.

The Southeast District Mainland, SEDM commercial salmon fishery takes place along the South Alaska Peninsula mainland, between Kupreanof Point and McGinty Point.

Numerous set netters hold DNR shore fishery leases in the SEDM area, paying annually to the State of Alaska. Most of these leases have existed for over a century; while the ownership of the leases has changed hands, the locations themselves have remained consistent through the years.

DESCRIPTION OF THE CURRENT MANAGEMENT PLAN OF SEDM

“Under the current SEDM Salmon Management Plan (5 AAC 09.360) states:

1. *The percentage of Chignik -bound sockeye salmon allocated to SEDM fishery is 7.6% of the total number of sockeye salmon harvested in the CMA through July 25.*
2. *Prior to July 26, 80% of sockeye salmon caught in SEDM are considered Chignik-bound.*
3. *Beginning July 1, sockeye salmon caught in NWSS are considered 100% local fish and not counted toward the Chignik allocation (Appendix C2) Fishing time in NWSS beginning on July 1, excluding Orzinski Bay, may not be open for more than an aggregate of 96 hours during a 7-day period. Fishing time in Orzinski Bay, after June 30, is based on sockeye salmon escapement into Orzinski Lake.*
4. *If Orzinski Lake escapement reaches or exceeds the upper bound of the sockeye salmon escapement goal, NWSS and Orzinski Bay could be opened concurrently as follows:*
 - (a.) Set gillnet gear may be operated continuously until midnight July 25, and*
 - (b.) Purse seine and hand purse seine gear may be operated for no more than an aggregate of 96 hours during a 7-day period.*
5. *If ADF&G expects that the sockeye salmon escapement goal will be met or exceeded, the waters of Orzinski Bay may be open to commercial salmon fishing continuously to:*
 - (a.) Set gillnet gear through July 10; and*
 - (b.) Set gillnet gear, hand purse seine, and purse seine gear from July 11 through July 25.*
6. *A limited portion of Orzinski Bay may open to purse seine gear prior to July 11 if ADF&G determines that the escapement goal will be met.*
7. *The Stepovak Flats Section is managed for chum salmon returning to Stepovak Flats streams for the entire season. However, 80% of the sockeye salmon in this section through July 25 are considered Chignik bound fish.*
8. *The area encompassing Kupreanof Point is closed to commercial salmon fishing from July 6 through August 31. ADF&G may extend the Kupreanof Point waters area through the end of the season by emergency order.*
9. *From July 26 through October 31, the fishery is managed for local pink, chum, and coho salmon stocks.*
10. *From July 26 through October 31, the fishery is closed for at least on 36 hour period within a seven-day period, excluding Orzinski Bay when ADF&G is managing local sockeye salmon.*

Also, we must contend with another colossal regulation that is hindering any viable efforts to fish on SEDM, creating havoc and an enormous negative impact on the SEDM fishery is the Chignik River Sockeye Salmon harvest, and the SEDM Allocation:

“ADF&G will manage the fisheries so that the number of sockeye salmon harvested in CMA, for both runs combined, will be at least 600,000 fish and the harvest of sockeye salmon considered to be Chignik bound in the SEDM will approach as near as possible, 7.6% of the total CMA sockeye salmon harvest through July 25. If the Chignik River early run fails to develop as predicted, the department will curtail fishing in the SEDM, excluding Orzinski Bay, until at least 300,000 sockeye have been harvested of the Chignik River sockeye salmon late run cannot be accurately evaluated due to the mixing of early and late run stocks. During this transition period, ADF&G may close or restrict commercial salmon fishing in SEDM until the strength of the late run has been determined. After July 8 if at least 300,000 sockeye salmon have been harvested in the CMA and escapement objectives are being met for the Chignik later run, the department will manage the fishery so that the number of sockeye salmon harvested in the CMA is at least 600,000. The number of sockeye salmon harvested in the SEDM before July 25 will be managed so the 7.6% of the total harvest of Chignik River sockeye salmon is taken in the SEDM. However, the harvest in SEDM at any time before July 25 may be permitted to fluctuate above or below 7.6% of the Chignik Area harvest.”

Several concerns have been identified regarding the current SEDM regulations:

The SEDM assumes that 80% of salmon are Chignik-bound through July 25, and in the Northwest Stepovak Section through June 30. However, recent genetic studies in the SEDM, specifically the WASSIP Study averaged over the years 2010 to 2012, suggest this figure is closer to 40-60%. The current regulations for SEDM do not align with the available genetic information, which indicates the presence of mixed stocks in the CMA area.

Is it possible that the historical method applied in the CMA relies on certain assumptions?

1. It assumes that all fish harvested from the CMA are destined for Chignik.
2. Assuming 80% of select SEDM harvest from June 1 to July 25 is Chignik-bound.
3. Chignik harvest may be overestimated; genetic data shows mixed stocks in CMA and current SEDM regulations do not align with genetics.
4. Stock apportionment varies over time and should be made more consistent by reducing errors from multiple methods.

Chignik's fisheries have experienced both strong and poor seasons. While good returns of salmon are always preferred, many in the SEDM and south Alaska Peninsula set net fishery have faced disappointing results. In 2025, only 4 to 20 set net permits were active, often averaging between 7 and 14.

SEDM CLOSURES

The following are SEDM closures as reported in the Alaska Peninsula and Chignik Annual Management Reports from ADF&G:

SEDM CLOSURES	
1997	No harvest in SEDM except NWSS CMA opening on July 7 delayed due to fishermen were on strike for higher prices.
2007	No harvest in SEDM
2008	No harvest in SEDM
2014	No harvest in SEDM
2018	No harvest in SEDM
2019	No harvest in SEDM
2020	No harvest in SEDM
2021	No harvest in SEDM
2022	No harvest in SEDM
2023	No harvest in SEDM
2024	No harvest in SEDM

In the last decade, the SEDM had seven years without a harvest.

Permit fishing activity in the Southeast District Management (SEDM) has shown notable fluctuation over the years. Following the adoption of Limited Entry in 1973, the number of set net permits fished in SEDM ranged from a low of 7 permits in 1975 to a peak of 64 permits in 1993, 1996, and 2000. Between 2015 and 2024, the average was 24 set net permits annually, dropping below 20 in 2025. With declining numbers of active set net permits and no anticipated increase in permit activity, alongside a reduction in active seine permits in Area L (Chignik Area), it is advisable that the Southeast District Management plan be reviewed and revised to better reflect current fishery conditions. Such amendments should aim to maintain sustainable fishery and ensure healthy annual returns.

COSTS OF OPERATION

Set net salmon operations face high initial expenses, including insurance, fuel, food, maintenance, and crew pay. With low ex-vessel returns and the dangers of fishing in exposed waters, profits are minimal or nonexistent.

Set net average ex vessel value

2015	59,743
2016	57,373
2017	73,688
2018	30,429
2019	48,372
2020	17,112
2021	38,813
2022	36,283
2023	23,083
2024	24,121
2025	61,246
average	40,902

These figures from the ADF&G Annual Report highlight our challenging financial situation. We need updated regulations that reflect the current conditions affecting salmon.

HISTORY OF SEDM FISHERY

The South Alaska Peninsula Salmon Fishery and SEDM have a deep cultural history rooted in the plentiful salmon, fish, and marine resources that serve both subsistence and commercial purposes. The cultural significance of the salmon industry can be seen along the shorelines near set net sites. There is evidence that Indigenous peoples in the region have fished for salmon since ancient times, as shown by the fishing tools and techniques discovered along tidepools and beaches.

Commercial salmon fishing in the South Alaska Peninsula began as early as 1888, with canneries built at Orzinski Bay in SEDM. Catch records start from 1908; permits and landings have been tracked since 1970. Early catches were mainly sockeye salmon, with Orzinkee Lake as the area's largest sockeye producer.

Since 1978, only set gillnet gear has been legally permitted until July 10; after that date, seine gear is allowed.

Between 1974 and 1977, the SEDM fishery operated on a day-to-day basis alongside Chignik Lagoon. In years like 1977, strong runs in Chignik Lagoon meant only short fishing periods were needed, even though daily and total harvests in the SEDM fishery remained low.

In 2011, Chignik fishermen experienced record returns of red salmon, despite ongoing set net fishing in the SEDM. The set net fleet saw only moderate returns, showing no impact or noticeable effect on the Chignik runs. That year, the SEDM fishery was open for more than 30 days from June into July, yet set net fishermen caught very few sockeye salmon each day, ultimately not affecting the neighboring Chignik Fishery.

Over the years, SEDM has seen various changes. Commercial salmon fishing is only allowed if the department expects a harvest of at least 600,000 sockeye salmon.

ISSUES WITHIN THE MANAGEMENT PLAN

Several issues exist in the Management Plan:

1. 80% of sockeye salmon caught in SEDM are Chignik bound.
2. The SEDM fishery is allocated 7.6% of the total Chignik bound sockeye harvested in CMA by July 25.
3. Since 1985, SEDM's share of Chignik bound sockeye in CMA has varied from 0.9% to 11.5%. If the CMA harvestable surplus exceeds 300,000 (or is expected to surpass 600,000 by July 5), certain parts of SEDM may open. By July 25, if the surplus is above or projected to be above 600,000, SEDM fishermen receive 7.6% allocation. In 1997, 2007, 2008, 2014, 2018, 2019, 2020, 2021, 2022, 2023, and 2024, no SEDM fishing occurred during the designated allocation period.

AMENDMENTS TO THE REGULATION

Amend the Southeast District Mainland Management Plan to increase commercial salmon fishing time for set gillnet gear as follows:

Amend the Southeastern District Mainland Management Plan to allow commercial salmon fishing with set net gear and after July 11 seine gear concurrent to the Chignik Area Commercial Salmon fishery as follows:

Conduct concurrent fishing periods between Area L (CMA) and Southeastern Mainland (SEDM).

(a) Elimination of the harvest of 300,000 -600,00 sockeye salmon in the Chignik Area before

fishermen in SEDM can harvest salmon; (b) to fish concurrently while Area L (CMA) fishermen are fishing Area M fishermen are fishing in SEDM

Reducing the allocation number below 600,000 and aligning it with SEDM and CMA fishery participation may be more effective than keeping existing criteria. The SEDM Fishery does not threaten the conservation or management of the Chignik run, even with regular openings. Therefore, the current 600,000 salmon catch threshold before SEDM fishermen can participate should be removed and revised.

The 80% Chignik bound estimate should be removed or lowered to align with the most recent WASSIP research findings.

For several years, we as fishermen have presented our concerns regarding the SEDM fishery to the board. Is it equitable to restrict or close one area to guarantee neighboring communities priority access to a public resource? Our families, fishing professionals, and local communities have relied on this resource for decades. The existing economic constraints should be reconsidered. Salmon are a state-managed resource, and fishermen in this area deserve the same rights to harvest them as others.

Science and local traditional knowledge should guide decisions, not political pressures. The fishing industry faces many challenges, with resource management being a major issue. Fishermen have adopted conservation protocols but often sacrifice income and bear the brunt of mixed stock fishery conservation, which differs from terminal fisheries and is not fully recognized.

CHUM SALMON

Further reductions or closures of our salmon fishery are unwarranted. Fishing is central to our community's livelihood, and we've developed conservation systems in collaboration with local stakeholders and ADF&G to avoid areas with high chum salmon concentrations. Our fishermen have voluntarily given up hours of fishing to improve conservation, surpassing strict management plans. Our fishermen have also forfeited several hundred hours of fishing time through voluntary closures and standdowns developing a system which is better than and Strick management plan with severe restrictions, all in the essence of improving conservation measures. Reducing or closing Area M Fishery will not address the root causes of salmon decline in the AYK region, and we urge the Board of Fish to use effective decision-making tools using the model tools that our fishermen have recently developed to enhance and sustain our fisheries all while making reasonable and equitable decisions with no binders of harsh restrictions that will threaten the viability of our fisheries.

KING SALMON

Is it a conservation issue if we keep the fish by keeping and killing them. Wouldn't it be healthy of them if a King Salmon can be released over the side swimming off the skippers of a boat by conserving the Kings that are alive to go over the side in an effort to conserve them with less stress on the salmon. With five guys on the deck of a seiner the healthy thriving King Salmon can be released quickly with minimal handling of the salmon over the side in the skippers they go swimming away in a healthy manner into the ocean. What better way to conservation of a species of salmon. Another way of conserving Kings is to not fish around high concentration areas of King Salmon; however, if more King Salmon are released in the Ocean more King Salmon will be caught and we need to take this factor into account. Whatever conservation measures are taken our area shouldn't be the only area with a conservation measure. Set netting rarely results in King Salmon catch and regulations should not unfairly impact any gear group, as harmful effects may follow poor decisions. Conservation measures should be implemented fairly across all fisheries, not just one fishery or area. We do not want to see unfair restrictive binders put upon any gear group in our fisheries.

Jack Foster Jr

Amy Foster

Jack Foster III

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Dwain Foster Jr., and I am a permit holder and Tribal Council member from Sand Point. My family has lived on the Alaska Peninsula for generations.

I depend on salmon for my livelihood. Salmon accounts for approximately 75 percent of my income, and further reductions in fishing opportunity would be devastating—not just for me, but for the entire community. Any additional reduction in fishing time would likely force people to move away, which would be extremely harmful for our school and the long-term stability of Sand Point.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Climate and habitat stressors cannot be regulated away, and further restrictions would hit small rural coastal communities hardest.

Please consider how deeply our communities rely on this fishery to survive.

Respectfully,

Dwain Foster Jr.
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I was born and raised in the Shumagin Islands to Aleut ancestry and come from a fishing family that has lived this way for generations. I strongly oppose any proposal that reduces fishing time, fishing area, or changes gear type.

Two villages I once lived in are now ghost towns: Unga and Squaw Harbor, where I was born. Does the Board of Fisheries really want this to happen to Sand Point and King Cove?

King Cove is already feeling the effects of losing its local processor — fewer students in schools, fewer jobs, and families moving away. These outcomes are real, and they are happening now.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, and 152.

Respectfully,

Dwain Foster Sr.
Sand Point, Alaska



Submitted by: Kyle Foster

Community of Residence: Sand Point

Name: Kyle Foster

Community of Origin: Sand Point, Alaska

Connection to Area M:

I am a business stakeholder, family fisherman, and representative of a Native organization from the Area M region. I also maintain active fishing investments in Area M. My family and professional history are rooted in Sand Point, and I continue to advocate for the economic and cultural well-being of communities that depend on these fisheries.

Comment to the Alaska Board of Fisheries

Dear Board Members,

My name is Kyle Foster, and I write in strong opposition to Proposals 127, 129, 130, 131, 132, 133, and 136. These proposals would further restrict time, area, and opportunity in Area M without clear, current scientific evidence that such actions will improve salmon returns to Western Alaska river systems.

Chum Salmon and Yukon–Kuskokwim Concerns

Recent Alaska Department of Fish and Game genetic stock identification work shows that Upper Yukon River chum make up only a very small fraction of the Area M June harvest, averaging well under one percent in recent years. The majority of chum intercepted in Area M originate from outside the Yukon–Kuskokwim region.

This demonstrates that Area M is not a primary driver of chum declines in the Yukon or Kuskokwim systems. Climate change, freshwater habitat degradation, and marine survival conditions are widely recognized as major factors affecting salmon productivity. These issues cannot be solved by reducing opportunity in a single, responsibly managed fishery.

Stepovak Bay and the Need for Updated Science

Management assumptions used in the Stepovak Bay and Southeastern District Mainland sections rely on older stock composition estimates. Salmon migration patterns, ocean survival, and run timing are not static. They change over time.

Instead of imposing more closures based on outdated models, the Board should require updated genetic sampling and stock composition analysis. Good management depends on current data. Restricting fishing opportunity before verifying modern stock proportions is not a sound scientific approach.

Real Community Impacts

I have personally witnessed how reduced fishing time has harmed families, businesses, and local services across the Alaska Peninsula and Aleutian region. Each new restriction removes income from communities that already face some of the highest costs of living in the state.

Fishing revenue supports housing, fuel, food, education, utilities, and year-round jobs. When opportunity is reduced without measurable conservation benefit, the burden is placed entirely on small coastal communities.

Request to the Board

I respectfully ask the Board to:

1. Reject Proposals 127, 129, 130, 131, 132, 133, and 136.
2. Maintain management flexibility in Area M.
3. Require updated, transparent genetic and stock composition studies before considering additional time or area restrictions.
4. Recognize that further reductions will harm rural communities without addressing the true drivers of salmon decline.

Area M fisheries are responsibly managed, economically essential, and culturally vital. Please protect both the resource and the people who depend on it.

Respectfully,

Kyle Foster

Sand Point, Alaska

Business Stakeholder | Family Fisherman | Native Organization Representative

Area M Fishing Investor

Submitted by: V Foster

Community of Residence: Sand point

Community Ties: Sand Point, Alaska

Relationship to Area M:

My family has deep roots in Sand Point and throughout the Alaska Peninsula and Aleutian region. Our livelihoods, culture, and long-term stability are tied directly to the health and accessibility of Area M fisheries. I submit this comment on behalf of my family and the many community members who depend on these fisheries for survival.

Statement to the Alaska Board of Fisheries

To the Alaska Board of Fisheries,

My name is Valeria Foster. I am writing to express strong opposition to a series of proposals that would significantly reduce fishing opportunity in the South Alaska Peninsula (Area M). These measures would impose additional closures, limits, and restrictions that threaten the economic and cultural foundation of our region.

Proposals That Would Harm Area M

I oppose the following proposals because they would restrict access, reduce fishing time, and increase uncertainty for Area M commercial fishermen:

South Alaska Peninsula Salmon June Management Plan

- 127 – Ten-day consecutive closure in June
- 129 – Delayed season start and reduced fishing time
- 130 – Reduced commercial openings
- 131 – Additional closures for seine and drift gear
- 132 – Intermittent mid-June closures
- 133 – Further reductions to June fishing time
- 136 – Chum harvest cap that could shut down the fishery early

Additional proposals that also reduce opportunity or flexibility

- 119–126 – Southeastern District Mainland and Stepovak Bay management changes
- 138–146 – Post-June restrictions
- 147–153 – Commercial gear limitations

Together, these proposals would shorten seasons, reduce income, and create instability for coastal communities that already face high costs of living and limited economic alternatives.

Science and Management Concerns

Available Alaska Department of Fish and Game genetic information shows that Upper Yukon River chum make up only a very small portion of the Area M June harvest, with most chum originating from outside Western Alaska systems. This indicates that Area M is not a primary cause of chum declines in the Yukon or Kuskokwim rivers.

In addition, stock composition assumptions used in the Stepovak Bay and Southeastern District Mainland areas are based on older data. Salmon migration patterns change over time, and management must reflect current conditions. Before adding new restrictions, updated genetic and stock composition studies should be required.

Community Consequences

When fishing opportunity is reduced, families struggle, businesses close, and communities lose year-round stability. These proposals shift the burden of conservation onto rural coastal communities while failing to address the broader factors impacting salmon runs, including climate and habitat stress.

Area M fisheries are responsibly managed and essential to the survival of our region. Further restrictions without current scientific justification will only cause harm.

Request to the Board

I respectfully ask the Board to:

- Reject Proposals 127, 129, 130, 131, 132, 133, and 136.119–126 – Southeastern District Mainland and Stepovak Bay management changes
- 138–146 – Post-June restrictions
- 147–153 – Commercial gear limitations
- Carefully review all related proposals that reduce time, area, or gear flexibility.
- Require updated, transparent scientific data before implementing further restrictions.
- Protect the people and communities who depend on Area M.

Thank you for your consideration.

Respectfully,

V Foster

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Wesley Foster, and I live in Sand Point, Alaska. I am a former fisherman with over 40 years connected to the Area M fishery. My family has fished for generations, and many still do. I am writing in opposition to further reductions in time, area, or opportunity in the Area M fishery.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

If these cuts continue, we will see Sand Point, King Cove, and False Pass become ghost towns—just like Unga, Squaw Harbor, Belkofski, and Sanak.

I used to run a very good business mending and building nets. That business is gone now. There is no work left. You can't sell a home if there's no fishing. You can't afford to live here with no income. There are no jobs in town outside of fishing.

Less fishing time year after year has made it extremely hard for crews to survive. People are struggling to pay for their homes, utilities, food, and basic living expenses.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system, and not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and cannot be regulated away.

Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

Decisions about our fisheries need to be based on science, not blame. Fishermen in Area M have already taken repeated cuts and worked to comply with conservation measures. Continued reductions will only push our communities further toward collapse.

Thank you for your consideration.

Sincerely,

Wesley Foster
Sand Point, Alaska

[REDACTED]

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I have been a commercial fisherman for over 46 years, fishing multiple areas of the Alaska Peninsula and Bristol Bay. My father began fishing Area M in 1958. This has been my way of life.

Salmon fisheries are crucial to these communities. Income is vital. Area M has taken the necessary steps to self-monitor harvest and manage chum bycatch. Fishermen in these areas have decades of firsthand experience—boots on the ground—often exceeding what can be captured in limited studies.

If the science is not complete, then complete it before making decisions that could devastate entire communities across the Alaska Peninsula. These decisions impact tens of thousands of people and families. Subsistence is vital, and compromise must include the realities of those whose lives depend on these fisheries.

The June Area M fishery is not a primary driver of AYK chum and Chinook declines. Area M has already reduced chum harvest through adaptive management. Runs vary by river system, and further restrictions would hit small rural coastal communities hardest.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Michael H. Galligan
Sand Point, Alaska



Submitted by: Brittany Gardner

Community of Residence: Sand Point, AK

To Members of the Alaska Board of Fisheries,

My name is Brittany Gardner, and I live in Sand Point, Alaska. I am submitting my comments today in the utmost opposition to any proposals (106,107,108,109,110,111,112,116,120,126,127,129,130,131,132,133,136,140,141,143,148,152) that would sharply reduce fishing time and opportunity in Area M. Any additional closures would do irreparable harm to our families and communities.

Fishing is not simply an occupation in Sand Point — it is the economic and cultural backbone of our town. My family has made its living from the ocean for generations, and like many others here, our financial security, way of life, and future are directly tied to access to healthy and sustainable fisheries.

When fishing opportunities are reduced, the consequences are immediate and deeply felt. These decisions affect whether families can meet basic expenses, whether small businesses can survive, and whether residents can afford to remain in one of the most remote regions of the state. How are we less important than others?

In communities like ours, there are few alternative industries to fall back on. The fishing economy supports not only fishermen, but also processors, fuel suppliers, mechanics, local retailers, schools, and essential services. A reduction in fishing time does not impact a single sector — it weakens the entire community infrastructure.

As a parent, I am especially concerned about what these decisions mean for the next generation. I want my son to have the same opportunity I had: to grow up in this community and to pursue a livelihood on the water if he chooses. Continued reductions in fishing access threaten to close that door. If opportunity is diminished to the point that fishing is no longer viable, our children will be forced to leave their home in search of work, and the cultural continuity of communities like Sand Point will be lost.

We fully recognize the importance of conservation and responsible fishery management. Our livelihoods depend on the long-term health of fish stocks, and we support science-based management that ensures sustainability. However, management decisions must also account for the human dimension. The burden of conservation should not fall so heavily on Area M communities that it undermines their ability to survive.

Fishing remains the primary economic driver in our region. Our families, small businesses, and communities depend on these fisheries. I respectfully urge the Board to support balanced management strategies that sustain fish populations while also preserving jobs, local economies, and the cultural traditions that define our coastal communities.

Thank you for your time and thoughtful consideration,

Brittany Gardner



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Glen Gardner Jr. I am a permit holder, local business owner, tribal member, and lifelong community member in Sand Point, with over fifty years tied to the fisheries.

Further reductions in Area M could mean businesses failing or being forced into bankruptcy. Local businesses have already struggled over the past few years, and additional restrictions could spell disaster.

June is a crucial month for fishermen, and in turn, for the local economy. Closing or restricting June fishing would have a direct and harmful impact on businesses and families throughout our community.

Area M has already reduced chum harvest through adaptive management, and these efforts have been successful. Further restrictions would hit small rural coastal communities the hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your consideration.

Respectfully,

Glen Gardner Jr.
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Earnest Gilbert Jr., and I am a crew member and part of a fishing family from Sand Point, Alaska. I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, and 152.

If further restrictions are placed on the Area M fishery, I will not be able to pay my bills. As a crew member, it is already extremely difficult to make ends meet. Winter fishing is just as bad, and the lack of opportunity year after year has made it harder to survive.

Crew members are struggling. Many of us own homes that we cannot sell, and without fishing income, we cannot afford to stay. Being a crew member in Area M is already very difficult, and further restrictions would make it impossible to remain here.

If the Board of Fisheries does what other areas are pushing for and continues to reduce or shut down Area M fisheries, I would be forced to abandon my home and move away from the community I depend on.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook salmon declines. Area M has already reduced chum harvest through adaptive management, and that effort has been successful. Runs vary by river system, and not all poor runs share a single cause. Climate and habitat stressors cannot be regulated away, and further restrictions would hit small rural coastal communities the hardest.

Please consider the real impacts these decisions have on crew members, fishing families, and communities like Sand Point that rely on the Area M fishery to survive.

Thank you for your time and consideration.

Respectfully,

Earnest Gilbert Jr.
Sand Point, Alaska

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I am a permit holder and boat owner from King Cove and have lived and worked in the Alaska Peninsula region.

Income from the June fisheries is a major source of revenue. That revenue is not going back into the community. Area M has already reduced chum harvest through adaptive management, and this effort has been successful.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Dean Gould

[REDACTED]

King Cove, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

Most of my life, I have lived and fished in King Cove.

These proposals would result in the loss of the way of life of my family and our family legacy.

They would also lead to loss of income in our community and decreases in population and school enrollment.

The loss of community population and school enrollment has already increased over the past few years with our cannery not up and running.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management. This effort has been successful. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and can't be "regulated away." Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Seyler Gould


King Cove, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

Both of my grandmothers are Native to the Shumagin and Sanak areas, and my grandfathers have been part of these fisheries since the late 1800s. Any amount of closure would likely mark the beginning of the end for these communities. My family loves where we live, and we want to stay.

If closures are applied, jobs will be lost and families who have lived here for generations will be forced to leave. Businesses will fail, fish tax revenue will disappear, and the community economy will slowly dissolve.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Further restrictions would hit small rural coastal communities hardest. If science-based credibility is the standard, then it must be applied honestly. Exaggerated claims against a fishery that has proactively taken steps to help conservation go against sound science. Nobody wins with a closure.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Michael Gundersen
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

These proposals would be devastating to our family livelihood. Our fishing and tendering operation would be greatly impacted in a negative direction. As a result, support for the local community in Sand Point would lose support from a family operation who has supported Sand Point for years.

This would be a major hit for all businesses in Sand Point and its upbringing.

Area M has already reduced chum harvest through adaptive management. This effort has been successful. Further restrictions would hit small rural coastal communities hardest. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Kurt Hastings



Sand Point, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I was born on St. George Island in 1961 and lived on St. Paul Island until school age. Although I now live outside Alaska, I have hundreds of family members and friends who depend on the fishing industry to survive.

You must understand how many Alaska Native families would be deeply impacted by closures in the fishing industry. The Aleut communities rely on this industry for employment, nourishment, and cultural continuity. Closing fisheries or canneries would devastate entire communities and affect the entire state of Alaska.

While I no longer reside in Alaska, I will still be affected because I help support my family financially. Generations of Alaska Natives depend on this industry, and these impacts extend far beyond individual fishermen.

Climate and habitat stressors are major drivers of decline and cannot be regulated away. Further restrictions would hit small rural coastal communities hardest and make it harder to manage mixed-stock fisheries effectively.

I respectfully oppose Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, and 152.

Thank you for your time and consideration.

Respectfully,

Raissa Hatfield
St. George Island, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I come from a family of fishermen, and I have been connected to fishing my entire life.

Reduced fishing would mean less money for our family and less food for our family, including no food put away for the winter.

Fishermen would come back to their families with less money. This could mean that many fishermen might stop fishing because they are not able to catch enough fish to feed and support their families, and they may start looking for other jobs. Some might not be able to find work, or they might find jobs that pay far less than fishing. Reduced fishing time would also affect schools because families might start moving away if their families are not making enough money.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and can't be "regulated away." Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Ellie Hoblet

[REDACTED]

False Pass, AK

Board of Fisheries Finfish Meeting

February 18 - 24, 2026

Anchorage, Alaska

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
Email dfg.bof.comments@alaska.gov

RE: Comments by Lena Hoblet for Alaska Peninsula, Aleutians, & Chignik Finfish Meeting, February 2026

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

My name is Lena Hoblet. I am writing as someone who grew up in the AYK region, where my parents still reside today, and as a mother whose children are rooted in the Aleutians. I have lived in these regions, worked in them, and continue to be deeply connected to the waters and communities that define them.

I currently serve as the Tribal Administrator for the Native Village of False Pass, and in that role I am a strong advocate for science-based fisheries management. My work is centered on protecting the long-term viability of our community while ensuring that fisheries policy is grounded in the best available science, equity, and stewardship of shared resources.

The rivers and oceans of Alaska are not abstract to me. They are home. They are family. They are the foundation of food security, cultural continuity, and community survival. My connection to these waters is both personal and professional, and it is intergenerational. The health of these fisheries directly affects not only my children's future, but the future of the communities I work to serve.

Because of this, I care deeply about how fisheries decisions are made. The Alaska Board of Fisheries has a responsibility to manage fisheries based on sound science, not regional bias, political pressure, or narratives that are not supported by data. When decisions drift away from science, the impacts fall most heavily on small, rural, and Indigenous communities.

I recognize and empathize with the hardship many communities in the AYK region are experiencing due to poor salmon returns. My family and lifelong connections are there and I do not take those struggles lightly. However, extensive scientific analysis does not support the claim that Area M fisheries are responsible for those declines. Genetic stock identification, escapement data, and climate research consistently point to large-scale environmental drivers, warming oceans and rivers, disease, changing marine food webs, and increased predation, as the primary factors affecting salmon survival across Alaska.

Shifting blame and putting more restrictions on Area M without scientific justification does not solve these problems. Instead, it risks devastating communities in the Aleutians and Alaska Peninsula that depend on fisheries for their economic stability, food security, and cultural survival. Trading the well-being of one region for another is neither effective nor just.

The Aleutian region, including the Native Village of False Pass, has demonstrated a strong commitment to conservation and responsible management. Fishermen and communities have supported adaptive management strategies that have significantly reduced chum harvest through voluntary stand-downs and real-time coordination, often at real economic cost. These efforts reflect a genuine dedication to stewardship and should be recognized as part of the solution.

I also believe strongly in dialogue and mutual understanding. I encourage our neighbors to come together, learn about one another's regions, and engage in respectful, science-informed conversation. When that happens, it becomes clear that we are not adversaries. We are all connected to these waters, and we all want salmon to survive for future generations.

For these reasons, I support the following proposals:

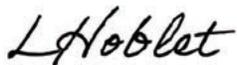
107, 113, 114, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, 154

I oppose the following proposals:

108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 136, 140, 141, 143, 148, 152

I respectfully urge the Board to uphold its mission, rely on the best available science, and consider the long-term cultural, ecological, and human impacts of its decisions. The future of Alaska's fisheries, and the communities who depend on them, depends on it.

Respectfully submitted,



Lena Hoblet
Tribal Administrator
Native Village of False Pass

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Melanie Hoblet. I am a Tribal member, lifelong resident of False Pass, and a parent raising two children in this community. My family has a history of commercial fishing and subsistence use in this region spanning more than 70 years.

Any reduction in Area M fishing opportunity would affect my entire family—my parents, my children, my siblings, and my extended family—and our ability to sustain our way of life here. Commercial fishing is, and always has been, central to how we live. It supports our ability to purchase household necessities such as fuel and utilities, and it allows us to supplement our subsistence lifestyle. Obtaining other nutritional foods here is extremely costly, and fishing income is what makes it possible.

This is a learned, well-established, and sustainable fishery that has only recently been blamed for salmon declines in other regions. We primarily catch fish that return to our local systems.

Our community has always depended on the fishing industry to sustain services and businesses year-round, but the salmon season is by far the most important. Area M fisheries support every facet of the infrastructure in our community. We have already seen permits, boats, and lifelong friends leave and not return due to increasing restrictions on this fishery.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Runs vary by river system, climate and habitat stressors cannot be regulated away, and removing management flexibility makes it harder to manage mixed-stock fisheries effectively. Further restrictions would hit small rural coastal communities hardest.

Please consider the real and lasting impacts these decisions will have on families like mine and on the future of communities such as False Pass.

Thank you for your time and consideration.

Respectfully,

Melanie Hoblet
False Pass, Alaska



Honorable Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries,

My name is Nicole Hoblet. I am the Mayor of False Pass, a lifelong resident, and a fourth-generation fisherman. I submit this comment on behalf of my family, my community, and the generations who have lived, fished, and raised their children in this place long before these waters were regulated.

My grandfather is 100 years old. He fished well into his 80s and he taught us that fishing is more than an occupation, it is responsibility, tradition, and survival. The values my grandparents and parents live by and have taught us are respect for the resource, stewardship, and sacrifice when necessary to continue to guide how our fishermen operate today and most importantly how our community thrives. These are not lessons learned from policy; they are lessons learned on the water, through cultural identity, traditional knowledge, and belonging.

I chose to remain in False Pass, to raise my children here, knowing that it is not the easy path, but it is the right one. My children are fifth-generation fishermen, growing up with the same connection to the sea and subsistence that shaped our family for generations. Fishing and subsistence are not separate parts of our lives but they are foundational to who we are as a people and how we care for one another as a community.

I am deeply concerned about the cumulative impacts of increased restrictions in Area M and what they mean for the long-term viability of our region. For communities like False Pass, fishing is the backbone of our economy and our food security. When access is reduced, the effects are immediate and far-reaching as families struggle with opportunities disappearing, income being depleted, costs rising, schools threatened with shutting down, mental health issues increasing... and the list goes on. Yet we are resilient and will continue to advocate for a livelihood we believe in. This is our home.

For these reasons, I support the following proposals:
107, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, and 154.

I oppose the following proposals:
108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 136, 140, 148, and 152.

False Pass fishermen have a long history of responsible participation in the fishery. We have adapted, sacrificed, and worked within management frameworks to protect salmon runs while continuing to support our families. Further restrictions threaten to undermine not just individual fishermen, but entire communities that depend on a healthy, accessible fishery to survive.

Decisions made by this Board do not exist in isolation. They shape whether small, remote communities like False Pass can continue to exist, whether our children can envision a future here, and whether generations of knowledge and stewardship will be carried forward or lost. I ask the Board to consider the people behind these decisions, the families who have chosen to stay, the children who represent the future of Alaska's fisheries, and the communities that have proven their commitment to conservation through action, not just words. Please give us the

chance to continue our stories, to preserve our indigenous knowledge and practices in the crucial role as stewards of our land.

Thank you for your time, your service, and for considering the perspective of False Pass and the people who depend on Area M fisheries.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nicole Hoblet', with a stylized flourish at the end.

Nicole Hoblet

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I am from Ikatan and False Pass. My grandparents used to walk to False Pass from Ikatan to work in the cannery. My maternal grandparents are and were valued members of Belkofski and King Cove. I also have family ties in Sand Point and Akutan.

There are no comparable alternative industries, so this lost income for individuals and businesses could mean families being forced to move elsewhere to find work or to afford to live. This could mean the beginning of the end for our community.

Critical community activity takes place in False Pass because of the commercial fishing industry. The municipality would lose at least half of its income from taxes alone. That would directly affect the public utilities departments that the City operates, as tax income offsets high diesel prices and unbalanced budgets in the electric and public water systems.

We have shown that we are committed to being good neighbors and that we care for other Alaskans who are suffering. The Adaptive Management Plan that our fishermen are complying with proves that we can, in real time, stand down when there are too many chums or Chinook being caught or avoid certain areas as information is shared. This is efficient, and science has not proven that we are the culprits in the demise of the AYK chum collapse. There are many factors. We seem to be the least populated and most easily targeted area once again.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Further restrictions would hit small rural coastal communities hardest. Runs vary by river system; not all poor runs share a single cause.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

Nikki Hoblet


False Pass, AK

Board of Fisheries Finfish Meeting

February 18 - 24, 2026

Anchorage, Alaska

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
Email dfg.bof.comments@alaska.gov

RE: Comments by Tom Hoblet for Alaska Peninsula, Aleutians, & Chignik Finfish Meeting, February 2026

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

My name is Tom Hoblet and I am a lifelong resident of False Pass, Alaska. Thank you for the opportunity to submit these comments.

I want to speak directly to the long-standing pattern in how Area M fisheries are discussed and treated in this process. While I respect the Board's obligation to consider proposals through due process, I am deeply concerned by the recurring narrative that portrays Area M fishermen as the problem rather than as long-standing, regulated participants in Alaska's fisheries.

For decades, Area M fishermen have been labeled with terms such as "interceptors," "chum chuckers," and "out-of-state profiteers," often without sufficient context or acknowledgment of the history, regulation, and stewardship that define this fishery. These characterizations persist despite generations of lawful participation, compliance with increasingly complex regulations, and ongoing adaptation to changing management frameworks.

It is critical to be clear about what the Area M fishery is and what it is not. Area M is a targeted salmon fishery. Salmon are the intended harvest, managed through time and area restrictions, reporting requirements, conservation triggers, and direct oversight by the Department. Area M is not a bycatch fishery. Framing it as such is inaccurate and undermines meaningful discussion about conservation. Area M fishermen actively work to mitigate chum and Chinook encounters. These efforts include voluntary stand-downs, area avoidance, cooperation with managers, and adherence to non-retention and conservation measures when required. These actions reflect a commitment to conservation that is rarely acknowledged in the broader narrative.

Yet Area M continues to be treated as a focal point for addressing salmon declines that are clearly system-wide in nature. When a fully regulated, targeted salmon fishery is repeatedly singled out while broader cumulative impacts across all fisheries receive less scrutiny, it creates the appearance that Area M is being used as a convenient substitute for addressing more complex and politically difficult issues. Area M fishing communities did not arrive recently, nor did they emerge in response to modern market forces alone. Our connection to these fisheries predates genetic stock identification, scale sampling, and contemporary allocation debates. Families and communities in this region adapted to the commercialization of the fishing industry just as any community would, rather than standing by and watching opportunity disappear.

What is troubling is that the same accusations resurface year after year, even as regulations tighten and conservation burdens continue to increase. At some point, the Board must ask whether continuing to treat Area M as a perpetual suspect advances sustainable fisheries management or simply erodes historic fishing communities.

Sustainability is not achieved by rhetoric or scapegoating. It is achieved through balanced management that considers science, cumulative impacts, historical participation, and the people who live with the consequences of these decisions.

Area M fishermen are not asking for special treatment. We are asking for fair, objective management that recognizes this fishery for what it is: a highly regulated, targeted salmon fishery with a demonstrated record of adaptation, cooperation, and conservation.

In conclusion, I respectfully ask the Board to consider the science and reject any proposals that would further restrict the Area M fisheries.

Respectfully,

Tom Hoblet
False Pass, Alaska

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery.

I was born and raised in Sand Point and am a lifelong resident and fisherman. I have spent my life fishing here.

These proposals, if passed, would completely end the way of life as I know it. Sand Point would become another ghost town.

These cuts would devastate the town of Sand Point, turning it into a ghost town and ending it all—especially for my grandkids, who would not be able to experience the way my family grew up. Loving what we do was passed down from generation to generation.

It would be devastating to lose our fisheries in June, which they think is the problem. It's not us. Chignik rebounded well last summer, yet we are still being targeted by them and by those up north. They will not be satisfied unless they shut us down completely. If that happens, I hope the government has deep pockets to take care of us and buy me out, considering I paid for my permit and boat. This would put me in the poor house, living under government support, which is not the way I was brought up.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Runs vary by river system, and not all poor runs share a single cause. Further restrictions would hit small rural coastal communities hardest.

We have self-regulated ourselves to help address the issues they have raised, but being ignored is completely wrong.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, and 152.

Sincerely,

Arthur Holmberg

[REDACTED]

Sand Point, AK

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding proposed changes affecting the Area M fishery.

I am a permit holder in Sand Point, Alaska, and I have been setnetting in the Sand Point Alaska Peninsula area.

It feels like discrimination that our area is always being targeted because we do not have enough people to support us. If this fishery is closed down any further, is the State prepared to buy back the permits we purchased at the price we paid for them? It is already hard enough making a living this way. The Board should look at other intercept fisheries closer to the region that, for a long time, have not shown chum catch issues in that area.

Further closures would shut everything down and would likely turn Sand Point into a ghost town.

It is unfair because of the limited time we are allowed to fish in the month of July, which does not help other regions achieve escapement goals when factors like weather and natural conditions affect where fish return.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system, and not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and cannot be regulated away. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,
Douglas Holmberg
Sand Point, AK



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Paul Holmberg. I am a fisherman and boat owner operating in Area M, with deep family history in the Aleutian East Borough and Alaska Peninsula.

Further reductions in fishing opportunity would affect my ability to pay housing costs, manage the rising cost of living, and keep my boat in safe working order. These impacts would also directly affect my grandchildren, who are interested in fishing and continuing our family's involvement in Area M.

When fishing opportunity is reduced, the entire community suffers. Local businesses, schools, and services depend on fishing as the main industry sustaining the local economy. You cannot run a boat operation without a crew, and you cannot find or keep qualified crew without sufficient fishing time.

Area M has already reduced chum harvest through adaptive management, and those efforts have been successful. Further restrictions would disproportionately harm rural coastal communities.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Respectfully,

Paul Holmberg
Sand Point / Area M

[REDACTED]

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I have been a crew member since 2008 on the F/V Karen Evich, which has fished in Area M since 1983. I purchased the vessel in 2018 from the original owner. I married into a Sand Point family that has fished salmon here for generations, and this community is our home.

If fishing opportunity is reduced further, my business may not survive. I could be forced to sell my vessel and move away. My daughter would no longer attend school here, and many families would leave Sand Point. Without salmon fishing, the plant would struggle to operate, fish tax revenue would disappear, and every aspect of the community would be impacted economically.

There has already been significant uncertainty with June fishing, making it difficult to retain crew and plan a season. We have already cut back substantially for the greater good and to avoid chum harvest. These reductions have directly affected business viability.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. The June Area M fishery is not a primary driver of AYK chum and Chinook declines. Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Please follow the science.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Alex Jackson
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I have fished year-round out of Sand Point since 2016, including summer salmon, fall pollock, and winter fisheries. These fisheries have allowed me to support my family, fund my life, and put a roof over our heads.

Reduced fishing time would mean a loss of income for my family and others who live in Sand Point. It would increase the already high cost of living and reduce revenue flowing into the community. Less fishing means fewer fishermen coming in the summer, less business for local stores, and fewer children in local schools as families are forced to leave.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Further restrictions would hit small rural coastal communities hardest.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Jacob Jackson
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding the proposed changes affecting the Area M fishery. I have been residing in the Aleutians and making a living fishing there for over a decade.

It would take a big chunk of income for most of the community. We're already getting hosed on fish prices. Everything is expensive in bush Alaska, and it puts hardships on families in the community.

The cuts have taken away a lot of revenue from fishermen and fish taxes. Our community has been like a ghost town.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. Area M has already reduced chum harvest through adaptive management. This effort has been successful. Runs vary by river system; not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and can't be "regulated away." Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Sincerely,

John Jaeger

[REDACTED]

Sand Point, AK

Submitted by: Angela Johnson

Community of Residence: Nelson Lagoon

I oppose proposal 113 because of its false accusations and lack of scientific data. "5 AAC 09.310 (9). Caribou Flats Section: from June 20 to July 31 by emergency order if the season ending sockeye salmon escapement at Nelson River is expected to be exceeded prior to August 1, fishing will be permitted with set and drift gillnet gear."

This proposal refers to the year 2024 when Nelson Lagoon (NLG) exceeded the upper escapement goal. This proposal falsely states that Nelson Lagoon fishermen are "not capable of harvesting a good or strong return of sockeye salmon to the Nelson River." After the 2024 salmon season was over, it was reported by the Alaska Department of Fish & Game that 87% of sockeye that escaped in Nelson River were 1 & 2-year-old fish. For the usual size of the mesh that is used in Nelson River (4&7/8ths), we were unable to catch these small fish and frankly, nobody would want to catch that small of fish anyway. As an experienced fisherman, I am more concerned with the fact that so many small fish returned to spawn so early and I'm wondering why.

It wasn't that the fleet was unable to harvest these salmon due to lack of effort. It was due to the size of the salmon. For example, if you look at the 2017 fishing season, Nelson Lagoon had a strong run with an escapement of 381,000 sockeye (ADFG Fish Count Data). The total harvest from Nelson Lagoon that year was 347,686 sockeye (ADFG Commercial Salmon Harvest Summary). This directly shows that we are capable of harvesting a good and strong return of sockeye.

This proposal also falsely states that the NLG escapement was over 750,000 sockeye, but the fish count data found on the ADF&G website clearly states the escapement was 729,766 once the weir was pulled. I don't know where that other figure came from.

Not only are the statements in this proposal untrue, but the caribou flats section has been closed for over 40 years and we have never experienced this large of an escapement before then. Even if a fleet was able to fish that section during the 2024 season, they wouldn't have caught any of those fish either because of their small size. Unless, of course, a fisherman is using smaller mesh than 4&7/8ths. In my opinion, a processing facility wouldn't want that small of a fish either.

The majority 105 members of CAMF begin their fishing season in southside area M and move to the north peninsula area M in OPH, Bear River, Ilnik, and Three Hills during those openers. I think they have plenty of area to catch a fish. From my 20+ years of experience fishing in the Nelson River, it does not make any sense to me why we would consider this proposal just because we had a season that produced majority small and immature fish that escaped. I will say that if this proves to be a problem in the future, and the science and data shows that, I will reconsider my stance on this matter. But as of right now, I am inherently opposed to this proposal.

Submitted by: Darren Johnson

Community of Residence: Nelson Lagoon

I oppose proposal 113. "Caribou flats section: from June 20 to July 31 by emergency order if the season ending sockeye salmon escapement at Nelson River is expected to be exceeded prior to August 1, fishing will be permitted with set and drift gillnet gear."

This proposal references a year where Nelson lagoon's escapement exceeded the goal. We knew the fish were small that summer and when the Alaska department of fish and game gave a summary of our season it was report that 87% of those sockeye salmon were only 1 and 2 year fish.

I've been a fisherman in Nelson Lagoon for 30 years. From my personal experience, I do not think that 87% of escaped salmon being only 1 and 2 year fish warrants this type of proposal. I am vehemently opposed to this proposal.

Submitted by: Katie Johnson

Community of Residence: Nelson Lagoon

I oppose proposal 113 regarding the Caribou Flats. The 2024 season that this proposal is referencing was a year where the ADF&G reported that 87% of the sockeye escaped in Nelson River were 1 and 2 year salmon. This proposal makes a false claim that our Nelson Lagoon fisherman are not capable of harvesting a strong return of fish, based off of that year. The reason why there didn't seem to be "enough" fish harvested had nothing to do with our fishermen's capabilities and everything to do with the size of the fish. The most common size mesh used in Nelson Lagoon is 4 and 7/8ths. With that size of mesh compared to the reported size of the salmon of that year, it is obvious that those fish were going thru everybody's nets and that's why so many escaped. As an experienced Nelson Lagoon fisherman, I absolutely oppose this proposal based on its false claims.

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I was born and raised in Sand Point, and my family has a long history of fishing here.

If the Board reduces time, area, or opportunity in Area M fisheries, it would mean we won't be able to afford everyday essentials or have a stable income. There is already not enough time to make any real money, and further reductions would force families to relocate and could lead to our town breaking apart.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Runs vary by river system, and not all poor runs share a single cause. Climate and habitat stressors are major drivers of declines and cannot be “regulated away.” Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Travis K
Sand Point, Alaska



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Nicole Kimball, and I work for a trade association representing shoreside processors, some of which are located in Area M and support fishing fleets throughout the Aleutians East Borough.

I work for shoreside processors that depend on Area M salmon fisheries to remain open and viable in this region. Further reductions in fishing opportunity would place already vulnerable communities in an even more tenuous position. Processors require sufficient volume to operate, and these fisheries make up the majority of operating revenue for Aleutians East Borough communities. The fleets are largely composed of resident fishermen, meaning the economic impacts are felt locally and immediately.

There is a direct and significant relationship between the health of Aleutians East Borough communities and direct access to commercial salmon fisheries in Area M. Board of Fisheries restrictions over the past several years, combined with the fleet-run adaptive management program to avoid chum, have resulted in measurable and significant reductions in chum harvest—estimated at 50 to 60 percent since the last Board meeting. These measures have been successful, but they have come at a high cost to communities in the form of reduced fishing access.

Please allow the adaptive management program to continue working while also allowing this fishery and the region it supports to survive.

Thank you for your time and consideration.

Respectfully,

Nicole Kimball
Anchorage, Alaska



Submitted by: Alanna Kochuten

FV Kristin Bell

Community of Residence: Unalaska

My name is Alanna Kochuten. I am a 27-year-old Unangax-False Pass native, Area M permit holder. The permit I hold has been in my family since it was originally issued. After university I worked to save up enough money, purchasing a vessel in late 2022, and have been operating her for the last 3 seasons. As a young fisherwoman I have a huge stake in the outcome of your deliberations. I come from generations of native fisherpersons. Job opportunities for our people of Area M communities have been difficult and sparse. Therefore, after high school I attended university, to ensure I had an opportunity for career employment outside of fishing, and my community. Not everyone has the opportunity or resources I have had to go to university. I strive to give back to my community and my people in all ways that I can. My boat is crewed by my family who I aspire to continue to teach and learn with, preserving our traditions and keeping our careers alive. Without an income, living subsistence is no longer an option either. I started this operation with intent of a steady revenue stream for myself and family, but it has been far from that. Outside of the fishing seasons, I have had to work as a merchant mariner for an additional 4-6 months each year, to barely make ends meet financially. Essentially, I have been on the water working or commercially fishing the last three years, with scarce time to spare just to keep my operations afloat.

I support the following proposals:

113,114,115,119,121,122,123,124,134,135,137,139,142,144,145,150,153,154,156-160,188

I oppose the following proposals:

108-112,116,117,118,120,126-133,136,140,141,143,147,148,151,152

Past closures have negatively impacted Aleutian families and communities without accomplishing the desired effect on the Western Alaska/AYK Chum Salmon stocks. How will this time be any different? I am sorry that the way of life in the Aleutians is being lost. Please do not take away my opportunity to hold onto my people's culture. Mentally, physically and financially we cannot keep up with the downhill trajectory of this struggling fishery and lifestyle. Please weigh carefully on the consequences of your deliberations. I am depending heavily on your time and consideration. Thank you.

Board of Fisheries Finfish Meeting
February 18 - 24, 2026
Anchorage, Alaska

February 3, 2026

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
Email dfg.bof.comments@alaska.gov

**RE: Comments for Alaska Peninsula, Aleutians, & Chignik
Finfish Meeting, February 2026**

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

My name is Delores Kochuten, my family has been fishermen and subsistence gatherers for over 100 years plus. We have raised our four children here in the Eastern Aleutians and they also fish and subsist on our waters and land. We live in the Area M where our fishery has been targeted over and over, this has to STOP, it has caused such strain and sadness for our village. Our people are struggling to even live out here. The cost of living is astronomically high. Our school count has gone down dramatically, Our children are our future, we need to keep them here in our village and teach them how to subsist and fish, be gatherers for their families and teach them what our ancestors have done for us.

Science shows that we are not the cause for Bristol Bays decline for fish. Climate change has something to do with it. As much as sockeye salmon return to Bristol Bay is in the millions every year, they need to provide all the fish that is needed for the Kuskokwim and whoever else needs it in that area in changing times, which we see too during different salmon cycles and warmer water years.

Thank you,



Delores Kochuten,

Resident of King Cove & previously, False Pass

Board of Fisheries Finfish Meeting
February 18 - 24, 2026
Anchorage, Alaska

February 3, 2026

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
Email dfg.bof.comments@alaska.gov

**RE: Comments for Alaska Peninsula, Aleutians, & Chignik
Finfish Meeting, February 2026**

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

My name is Raymond Kochuten I've been a subsistence gatherer and fisherman for 65 years and more. I have lived in Area M all my life. I have been fishing since I was 12 years old. I have taken my four daughters, my wife and many others fishing with me. We subsist and live off of our land and always have. I strongly oppose what these proposals are claiming. Climate change and science shows that we are not intercepting Bristol Bays fish. I remember fishing the whole month of May, June, July, August and some of September. Shutting down Area M for the month of June will not resolve and bring back the fish to the Kuskokwim. It is not our fault that they have no return, it is obvious in previous years they have overfished the streams and they have no return.

Sincerely,



Raymond Kochuten,

Area M Resident, King Cove & False Pass

Proposal 156: Approve with Amendments

Summary of Amendments

Alaska Peninsula Freshwaters, except for Chignik;

- January 1-July 25: Open to king salmon fishing;
- No retention of king salmon;
- All king salmon caught may not be removed from the water and must be released immediately;
- January 1-July 25: Tackle is restricted to single hook, artificial lures or flies;

What is the issue you would like the board to address and why?

By general regulation, several freshwater river systems on the northern Alaska Peninsula—including Cinder, Meshik, Black Hills, Steelhead Creek, and North Creek—remain open to king salmon retention and allow liberal sportfishing gear types such as bait and multiple hooks. In contrast, other, and most heavily used systems, on the Alaska Peninsula—including the King Salmon, Bear, Sandy and Nelson/Sapsuk Rivers—are already managed under special regulations that restrict harvest and/or gear use.

The lack of consistent regulations across neighboring river systems creates uneven management standards for king salmon populations that are exposed to the same broad environmental challenges in-river and marine pressures. This proposal seeks to standardize and broaden king salmon sportfishing regulations for rivers on the north side of the Alaska Peninsula that drain into the Bering Sea, ensuring a more precautionary, consistent, and conservative regulatory approach that better protects data-limited king salmon stocks while reducing regulatory confusion for anglers.

These amendments were discussed, agreed to, and supported by Kyle Kolodziejski (manager, Aleutian Adventures), Bob Murphy (Author of Prop 156), Mike Watt (Author of Prop 157), David Luthy (Author of Prop 158).

Regulatory Language Suggestions

65 AAC 65.020 General Provisions

King Salmon:

- (1) Open to king salmon fishing from January 1 through July 25 as follows:
- (i) No retention of king salmon; All king salmon caught may not be removed from the water and must be released immediately;
 - (ii) only single hook artificial lures or flies may be used;

65 AC 65.022 Special Provisions

Chignik River:

- (1) king salmon may be taken only from January 1 through August 9 as follows:
 - (i) 20 inches or greater in length; bag and possession limit of 2 fish; annual limit of 5 fish; a harvest record is required as specified in 5 AAC 75.006;
 - (ii) less than 20 inches in length; bag and possession limit of 10 fish; no annual limit;

Alaska Peninsula freshwaters, except for Chignik:

- (1) only single hook artificial lures or flies may be used from January 1 through July 25;

Proposals 157 & 158: Approve with Amendments

Summary of Amendments

Special regulations - Sandy River:

- January 1-July 25: Open to king salmon fishing;
- No retention of king salmon;
- All king salmon caught may not be removed from the water and must be released immediately;

What is the issue you would like the board to address and why?

The absence of consistent special regulations governing king salmon retention across neighboring river systems results in uneven management standards for king salmon populations that are subject to the same broad environmental challenges in-river and marine pressures. This proposal seeks to better align and improve regulatory clarity for data-limited systems like the Sandy River with existing special regulations already in place for the King Salmon, Bear, and Nelson/Sapsuk Rivers.

These amendments were discussed, agreed to, and supported by Kyle Kolodziejcki (manager, Aleutian Adventures), Rod Schue (owner R&R Hunting), Jimmy Martin (owner Hoodoo Sportfishing Lodges & Wildman Lodge), Bob Murphy (Author of Prop 156), Mike Watt (Author of Prop 157), David Luthy (Author of Prop 158).

Regulatory Language Suggestions

65 AC 65.022 Special Provisions

Sandy River:

- (1) king salmon may be taken only from January 1 through July 25 as follows;
 - (i) No retention of king salmon; All king salmon caught may not be removed from the water and must be released immediately;

Submitted by: Devin Kosbruk
Community of Residence: Perryville

I support proposals 112, and 143 with the Chignik AC Amendments

Submitted by: Maxim Kusnetsov
Community of Residence: Homer

To whom it may concern,

My name is Maxim Kusnetsov, and I fish on the F/V Sonar. I began fishing in Area M as a deckhand with my father when I was a teenager and have been running my own boat since the summer of 2020. I am writing to state my support for the following proposals: 113, 114, 115, 119, 121, 122, 123, 124, 134, 135, 137, 139, 142, 144, 145, 150, 153, 154, 156-160, and 188.

I oppose the following proposals: 108-112, 116, 117, 118, 120, 126-133, 136, 140, 141, 143, 147, 148, 151, and 152.

With every Board of Fish cycle, Area M fishermen are blamed for poor river returns and failing fisheries in the AYK region. However, multiple scientific studies—including WASSIP, the 1987 ADFG Tagging Study, the 2025 June fishery chum genetics sampling, and the 2025 Chum radio tagging project—have consistently shown otherwise. The evidence points to causes like warming ocean waters and impacts from other fisheries, not Area M harvests.

Please oppose any proposals that would place further strain on our already struggling fishery. Thank you for your time and consideration.

Sincerely,
Maxim Kusnetsov
F/V Sonar

Submitted by: Michael Kusnetsov
Community of Residence: Homer

To Whom It May Concern:

My name is Michael Kusnetsov. I have been fishing in False Pass since 2008, starting as a deckhand, and I've been running my own boat as captain since 2017.

I support proposal numbers: 113, 114, 115, 119, 121, 122, 123, 124, 134, 135, 137, 139, 142, 144, 145, 150, 153, 154, 156, 157, 158, 159, 160, and 188,

and oppose proposal numbers: 108,109, 110, 111, 112, 116, 117, 118, 120, 126, 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, 143, 147, 148, 151, and 152.

Every Board of Fisheries cycle, our area seems to get blamed for broader statewide problems, especially poor escapements in other regions. We are a small fishery with relatively few participants, which makes us an easy target. However, multiple scientific studies have shown that factors such as warming ocean conditions and impacts from other fisheries play a much larger role than False Pass or Area M fishermen. We already operate in a tightly managed fishery, and additional restrictions will only hurt working families without solving the real problems. Please do not make changes that will further damage our area. We are not the cause of these statewide issues.

I respectfully ask the Board to leave our fishery as it is and oppose any proposals that would place more strain on an already struggling group of fishermen.

Thank you for your time and consideration

Submitted by: Pavel Kusnetsov
Community of Residence: Homer, AK

To whom it may concern:

Hello, My name is Pavel Kusnetsov, on the F/v Champion. I've been fishing in Area M since 2006, started as a deckhand and have been running my own gillnet boat for the last 12 years. I support proposal numbers: 113,114,115,119,121,122,123,124,134,135,137,139,142,144,145,150,153,154,156-160,188 and oppose proposal numbers: 108-112,116,117,118,120,126-133,136,140,141,143,147,148,151,152.

It seems to me that every Board of Fish meeting cycle, Area M is accused as being the culprit for failing fisheries and underperforming river escapements (AYK region), while multiple scientific studies (WASSIP, 1987 ADFG Tagging Study, 2025 June fishery chum genetics sampling, 2025 Chum radio tagging project) have indicated otherwise. Science backed reports have pointed to warming waters and other fisheries as the culprit for AYK chums not returning to their spawning grounds, not Area M fishermen.

Please consider opposing any and all proposals that would any more undue strain on an already struggling fishery. Thank you for your time and consideration.

To Whom It May Concern,

My name is Safron Kusnetsov, operator of the F/V Defiance. I have fished in Area M since 2008—first as a deckhand with my father, and for the past 12 years as the owner and operator of my own gillnet vessel.

I support proposal numbers 113, 114, 115, 119, 121, 122, 123, 124, 134, 135, 137, 139, 142, 144, 145, 150, 153, 154, 156–160, and 188, and I oppose proposal numbers 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

It has become a recurring theme in Board of Fisheries cycles for Area M to be portrayed as the primary cause of failing fisheries and underperforming escapements in the AYK region. However, multiple scientific efforts—including WASSIP, the 1987 ADF&G tagging study, the June 2025 chum genetics sampling, and the 2025 chum radio-tagging project—do not support this narrative. Instead, these studies point to factors such as warming ocean conditions and impacts from other fisheries as significant contributors to poor AYK chum returns, rather than Area M harvest.

Despite this, Area M is consistently treated as the “villain” in allocation and conservation discussions. This is particularly troubling given that Area M runs have collapsed over the past three years, and Area M is arguably one of the only fisheries in the state that has not experienced sustained success during that period.

I respectfully ask the Board to oppose any proposals that would place additional restrictions or burdens on Area M fishermen without clear, science-based justification. Further constraining an already struggling fishery will not resolve broader regional stock issues and risks causing unnecessary harm to fishermen who are not responsible for those declines.

Thank you for your time and consideration.

Respectfully,

Safron Kusnetsov
F/V Defiance



Submitted by: Kirik Kuznetsov

Community of Residence: Homer, Alaska

To whom it may concern:

Hello, My name is Kirik Kuznetsov, on the F/v Platinum. I've been fishing in Area M since 2008, started with my dad as a deckhand and have been running my own gillnet boat for the last 12 years. I support proposal numbers:

113,114,115,119,121,122,123,124,134,135,137,139,142,144,145,150,153,154,156-160,188 and oppose proposal numbers: 108-112,116,117,118,120,126-133,136,140,141,143,147,148,151,152.

It seems to me that every Board of Fish meeting cycle, Area M is accused as being the culprit for failing fisheries and underperforming river escapements (AYK region), while multiple scientific studies (WASSIP, 1987 ADFG Tagging Study, 2025 June fishery chum genetics sampling, 2025 Chum radio tagging project) have indicated otherwise. Science backed reports have pointed to warming waters and other fisheries as the culprit for AYK chums not returning to their spawning grounds, not Area M fishermen.

Please consider opposing any and all proposals that would any more undue strain on an already struggling fishery. Thank you for your time and consideration.

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Brennen Larsen, and I am a resident of King Cove, Alaska. I am submitting this comment in strong opposition to any proposals that would significantly reduce fishing time or opportunity in Area M. Additional closures would cause irreparable harm to our families, our culture, and our communities.

Fishing has been a way of life for my family for many generations. We are descendants of the Unangan (Aleut) people, who have relied on these fisheries for survival since time immemorial. Fishing is not just an occupation for us—it is who we are. My grandfather has taught me traditional knowledge passed down through our ancestors, including how to respect and preserve the resource so it can sustain future generations. These teachings align with conservation, not conflict with it.

Without access to our fisheries, our community cannot survive. Many families in our region depend directly on fishing income to support their households, and many more rely on the ripple effects through local businesses and services. Fishing is the primary economic driver in our region, and restricting access threatens jobs, food security, and the continued existence of communities like King Cove.

I respectfully urge the Board to listen to the science and research that supports sustainable fisheries while also recognizing the human cost of further restrictions. Please support balanced management that protects fish populations while sustaining local livelihoods, economies, and cultural traditions that have endured for generations.

Respectfully,

Brennen Larsen
King Cove, Alaska

[REDACTED]

Correction of Proposal 147

As the author of proposal 147, I was embarrassed to realize my error in the text of “What is the issue you would like the board to address and why?” section in the proposal book. The proposal should read:

5AAC 09.331. Gillnet specifications and operations.

Reduce maximum gillnet depth to 70 meshes, as follows:

5 AAC 09. 331. Gillnet specifications and operations. (a) The size and operation of drift gillnets is as follows:

(3) In the Northwestern, Unimak, and Southwestern Districts, no drift gillnet may exceed 70[90] meshes in depth.

(b) the size and operations of set gillnets is as follows:

(C) in the Northwestern, Unimak, Southwestern, South Central and Southeastern Districts, a set gillnet may not exceed 70 [90] meshes in depth;

What is the issue you would like the board to address and why? The Area M June salmon fisheries, particularly the drift gillnet fishery, harvest the depleted western Alaska chinook and salmon stocks. Sockeye salmon stocks are known to prefer surface waters while chinook and chum salmon run deeper. Sockeye salmon are the primary target of these fisheries, the money fish. Extraordinary conservation measures have been taken to conserve many Alaskan wild stocks of chinook and western Alaskan chum salmon. Focusing these fisheries on sockeye salmon will help conserve the depleted wild salmon stocks, thereby addressing in part the legal and ethical requirements of wild stock sustainability.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This concern has been widely discussed in western Alaskan groups. I was not aware of the proposal being brought to the Board of Fisheries this cycle, so I am submitting it.

Please accept this correction to the language of Proposal 147. The intent of the proposal and the regulatory language is unchanged.

Signed Charles Lean

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

My name is Anthony Lekanof, and I reside in Anchorage, Alaska, with strong ties to St. George Island. I serve on the Board of Directors for The Aleut Corporation, and we have donated to support Area M fishermen and their families.

Since 2020, I have served as a board member for The Aleut Corporation and have had direct engagement with individuals from the Area M fishery who have advocated for greater involvement in protecting this commercial fishery. As a well-rounded member of the Aleut Board, I am personally invested in seeing this fishery succeed through community advocacy, education, and continued financial support for Area M fishermen to engage with their leaders.

To deprive a fishery of its right to harvest is a direct insult not only to the fishing community, but to the local residents who continue to make a living in the place they call home. Having lived both full-time and seasonally in rural Alaska, I know that housing and living costs exceed the national average by two to three times. Removing an entire fishery based on emotional arguments from other regions creates severe financial hardship and allows outside interests to dictate the future of local communities.

These proposals encourage outward migration and do not support the heart of the communities people call home. Once a community's school closes, it is effectively lights out for the village. As families face financial uncertainty, they begin asking whether it would be easier to live elsewhere. My family moved away from the Pribilof Islands in 2012, and since then we have worked toward reestablishing a presence in my hometown so our children can see the beauty and opportunity that exists there.

From the 1990s through the early 2000s, St. George processed seafood through SnoPac and Blue Wave. Those operations provided meaningful jobs, stable fish tax revenue, and a sustainable future for local government and infrastructure. Today, the community has fewer than thirty full-time residents. When the industry left, families followed, and the partnership between the industry and the community collapsed.

While circumstances differ, the lesson is the same. Limiting the Area M fishery creates an uncertain financial future for Aleutians East Borough residents. Their voices matter. Our voices as full- and part-time residents matter. Aleuts often say, "We are One." This issue is personal, and opposition to these proposals is about unity, not division.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines. Climate and habitat stressors cannot be regulated away, and salmon runs vary by river system.

Thank you for your time and consideration.

Respectfully,

Anthony Lekanof
Anchorage / St. George Island
[REDACTED]

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Board of Fisheries:

I am submitting this public comment regarding proposed changes affecting the Area M fishery.

I am from the Aleutians East region, from my children all the way to my ancestors. While I currently live outside the region, my family and cultural ties to the Aleutian Islands remain strong, including family members living on St. Paul Island.

Fishing is essential for my heritage to thrive and for Unangax people's food security and subsistence. Further restrictions would cause harm not only to the way of life today, but would also reopen wounds from past generations who experienced control and restrictions placed on their traditional ways of living.

Any reduction in fishing opportunity would negatively affect schools, utilities, local services, and local businesses. Fishing is the primary economic driver in these communities, and families rely on it for food, income, and cultural continuity. Further restrictions would hit small rural coastal communities hardest.

I am opposed to Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

Thank you for your time and consideration.

Sincerely,
Michelle Lekanof
St. Paul Island, AK



Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To the Members of the Alaska Board of Fisheries:

I have fished out of King Cove for the past 20 years and have made it my home away from home. I run the groundfish side of our business, fishing for pollock, cod, blackcod, and crab. Salmon is a vital part of our fishing business, and responsible, science-based management is essential to ensuring its future.

Further restrictions would dramatically reduce my ability to provide a steady livelihood for my family. The local community is already experiencing hardship, and additional limitations could be the final blow.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. The June Area M fishery is not a primary driver of AYK chum and Chinook declines. Further restrictions would hit small rural coastal communities hardest.

I respectfully oppose Proposals 127, 129, 130, 131, 132, 133, 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, and 152.

Respectfully,

Ben Ley
King Cove, Alaska

