

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.

My family on both sides has fished in Area M all their lives. It's how mine and many other families make a living and feed their families.

Limiting access to this area will greatly affect the community and ways of living where I'm from. We've fished this area most of our lives. It's how we feed our families and fill our freezers for the winter. There aren't many job opportunities aside from fishing in my community and in most Area M communities.

Chances are, if this area is greatly impacted, many families, including my own, won't be able to afford to live there anymore. We would lose our homes and be unable to feed our families. Without this fishery, my town and others won't be able to sustain themselves. In the winter, many families rely on income from the summer fisheries to keep them afloat.

Our neighboring town of King Cove recently lost its fishing cannery, and many of the boats had to switch areas or quit fishing altogether. This issue has impacted many families and will continue to do so. Many families will have to travel farther to make a living, impacting other fishing communities with an influx of boats and increased competition.

Area M has already reduced chum harvest through adaptive management. This effort has been successful. Further restrictions would hit small rural coastal communities hardest. Climate and habitat stressors are major drivers of declines and cannot be "regulated away." Runs vary by river system; not all poor runs share a single cause.

Sincerely,

Alyssa Ludvick

  
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 have fished False Pass and Port Moller from 1979 to 2025 and have fished Area M my entire life out of Sand Point. My permit was issued to my father, and he passed the permit down to me in 1989. The permit has been in my family since it was issued by the state.

Fishing Area M has been an extremely important source of income and is a critical livelihood. It would devastate my financial, lifelong livelihood.

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 (AYK) chum and Chinook declines. Further restrictions would hit small rural coastal communities hardest.

Shutting down the Area M fishery would devastate coastal communities and hurt a lot of fishing families, businesses, and the local and state economy.

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,

Paul Ludvick



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 Joanna Ludvick McCallum, and I am a local business owner, tribal member/subsistence user, part of a fishing family, and community member in Sand Point.

Area M fishermen have taken multiple cutbacks to fishing time over the years and it is just not fair. Approximately 80% of our town are local Aleuts. We just want to be able to fish and provide subsistence food to local Aleuts.

Cutbacks on fishing time will hurt our brave fishermen. They are just trying to provide food to people. 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,

Joanna Ludvick McCallum  
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 Cherilyn Lundgren. I live in Sand Point, Alaska, and I am a member of the Qagan Tayagungin Tribe. I come from a family that has fished for generations in Area M, and my husband and son are still fishing today. Our crew was made up entirely of local residents, including two high school students.

Aleutians East Borough is home to more than 3,000 Alaskans, many with heritage in the Eastern Aleutians that goes back hundreds of years. Our population has always depended on fishing for income and subsistence. We have no other industry that sustains our communities. Without fishing, we cannot maintain our cities or local jobs, and families will be displaced from their homes. We are already seeing these effects in King Cove following the loss of the cannery.

I have worked in the Aleutians East Borough School District for 20 years and have seen firsthand how fishing affects our schools. The district originally had six schools; two have already closed, and we struggle to keep another above minimum enrollment. Over the last five years, student enrollment in our two largest communities has dropped by approximately 30 percent, resulting in a 30 percent staff reduction and four teaching positions being cut to part-time. Nearly half of our teachers grew up here and returned to serve their home communities. Many classified staff are also fishing families who would be directly affected by further restrictions in Area M.

Our School District is funded by the State and the Borough. The Borough's revenue comes from fish taxes, and taking fishing time away from Area M would reduce Borough revenue and directly impact our schools, leading to further cuts.

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.

Once again, I am asking the Board not to cut our fisheries any further. The South Alaska Peninsula region has already absorbed significant impacts. Before imposing additional restrictions, more research and study are needed to identify the true causes of salmon declines, including environmental factors such as weather patterns and historical and current mining impacts in other river systems.

Thank you for your time and consideration.

Respectfully,

Cherilyn Lundgren  
Sand Point, Alaska



**Submitted by:** Taylor Lundgren

**Community of Residence:** Sand Point

To the Chair and Members of the board:

My name is Taylor Lundgren. I live in Sand Point and I am a captain of a local salmon seiner with 100% local crew who depend on this fishery for their livelihoods. I am submitting this comment in opposition to Proposal 148.

I am against adopting Proposal 148 or any measure that would restrict gear depth. These types of restrictions would have real and immediate economic impacts on working fishermen and crew, without clear evidence that they would provide meaningful conservation benefits. The proposed gear changes would be very costly and nearly impossible for the fleet to comply with by the start of the season.

I have also served as one of the officers helping implement and enforce the Area M adaptive management program for chum salmon avoidance, which has proven to be a very successful approach. This program allows fishermen to respond in real time to chum salmon presence and has demonstrated that conservation objectives can be met without imposing broad, prescriptive regulations.

Because of this, issues related to chum salmon avoidance are already being effectively addressed through Area M's self-management and adaptive management framework. I am also opposed to any proposals that would restrict time or area in Area M due to chum salmon or Chignik sockeye, as these concerns are already managed through existing adaptive and in-season processes.

I support conservation and sustainable management of salmon stocks, but management actions should be based on sound data and balanced to avoid unnecessary harm to the commercial fleet. I urge the Board to reject Proposal 148.

Thank you for the opportunity to comment and for your consideration.

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**Submitted by:** Taylor Lundgren  
**Community of Residence:** Sand Point

Taylor Lundgren

[REDACTED]  
Sand Point, AK 99661  
[REDACTED]

To Chair and Members of the Board,

My name is Taylor Lundgren, and I am writing in support of Proposal 154, which I authored, to establish a herring bait fishery in the Sand Point and King Cove districts. As outlined in my proposal, this fishery would provide significant benefits to both fishermen and processors.

Based on current data, the biomass appears sufficient to support this fishery, and I hope the Board will give Proposal 154 serious consideration. This fishery represents an important opportunity to strengthen our local fishing communities and sustain economic activity in the region.

Thank you for your time and consideration.

Sincerely,

Taylor Lundgren

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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 family moved from Unga to Sand Point and helped build the village it is today. I have fished commercially here my entire life. There is no way I could afford to live with any more fishing time taken away. We have already given up significant time and proven that we are trying to help, but we still need to survive.

If more time is taken, communities like Sand Point would be shut down. There would be no way for families to stay.

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,

Timothy Lundgren  
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 proposed changes affecting the Area M fishery.

I am most connected to Sand Point and the Aleutians East region. I was born and raised here, and my family has long-standing ties to commercial fishing, subsistence harvesting, and community life in the Eastern Aleutians.

A reduction in Area M fishing opportunity would directly affect my household and my ability to continue living and working in Sand Point. Fishing income helps offset the extremely high cost of living in our community, including food, fuel, housing, and transportation. Even modest seasonal income makes the difference between financial stability and having to leave the community. As an educator, I rely on fisheries income and the fisheries economy to remain viable year-round in Sand Point. Reduced opportunity would limit supplemental income for many households, increase financial stress, and make it harder for young families and working professionals to stay. Over time, this would push people out of the community, including teachers, crew members, and essential workers.

Further restrictions on Area M fisheries would weaken the entire local economy. Fewer fishing opportunities mean less income circulating locally, which directly affects small businesses, fuel sales, utilities, and local services. This loss of economic activity would reduce the community's ability to support year-round jobs. For schools, population decline and financial instability mean lower enrollment, staffing challenges, and fewer resources for students. Sand Point already faces difficulties attracting and retaining teachers and staff. Reducing fisheries opportunity would make that problem worse and threaten the long-term sustainability of essential community services.

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 cannot be regulated away. Further restrictions would hit small rural coastal communities hardest.

Area M fisheries have already demonstrated flexibility and responsibility through adaptive management. Continued reductions will not address broader issues like climate change, marine survival, or habitat degradation. Instead, they place an outsized burden on small coastal communities that depend on limited seasonal opportunities. Effective fisheries management should balance conservation goals with the social and economic realities of the communities most affected.

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,  
Colten Mack  
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 have fished Area M my entire life, including tendering, beach seining, seining, drifting, and set net fishing, from Port Heiden to Kupreanof.

The loss of income would mean the loss of our livelihood. We depend on subsistence to fill our freezers and feed our families. We work hard from a young age, teaching our kids how to provide for themselves, especially during June. We take pride in our first fish and use that experience to educate our children about how precious wild-caught salmon is.

A loss of fishing time means many people will not be able to provide for their families, and it would drastically change our school. Our teachers are already spread thin and teach multiple classes at once just to make ends meet.

There would also be a loss of school funding due to losing students as a result of drastic changes that have already occurred throughout the fishing industry.

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. Climate and habitat stressors are major drivers of declines and can't be "regulated away."

I hope the Board of Fisheries will deeply consider what is being proposed and understand that pointing fingers and placing blame on the very people who have worked hard to comply with everyone's needs is wrong. Area M has already taken action to help with chum concerns and interception of salmon by standing down when the time is right. Please do not place value over people or pit communities against 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,

Earl Mack

  
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:

My name is Edward Mack. I am a permit holder and drift gillnet operator from King Cove, Alaska. I was born and raised here, and this is where my family originated. I have spent my life fishing commercially and for subsistence and investing in my community.

If our fishing time is reduced again, I am afraid it would put me out of business. After doing this all my life and putting everything I have into fishing and the community, it feels like it could all be gone.

In my mind, our community would not survive another round of cuts. It is very sad, but the reality is that we will not be able to continue building our community or raising our families in the place we call home if fishing opportunity continues to be reduced.

Area M has already reduced chum harvest through adaptive management, and those efforts have been successful. Further restrictions would hit small rural coastal communities the hardest and would not address the broader causes of salmon 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.

Thank you for your time and consideration.

Respectfully,

Edward Mack  
King Cove, 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 Jane Mack, and I am from King Cove. I am writing in opposition to further reductions in Area M fishing opportunity.

The prior years' reductions of Area M have long been impacting the quality of life in these areas. It's long been negatively impacting our community. Fishermen already cannot afford the cost of living.

People are having to move out of their communities because of lack of work, while inflation goes up and jobs go down. 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.

Respectfully,

Jane Mack  
King Cove, 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:

Any further restrictions on Area M salmon fishing would essentially wipe us out. Without salmon income, we won't have the money to expand into other fisheries that may be available.

This is already a struggle for the city government and school, which are now at half capacity, and there are fewer tax dollars for the city. We have seen a large loss of school children, people are moving, stores are getting more expensive, and our only grocery store might close in the next two years when their lease comes up. With no processing plant in King Cove/False Pass, the economic pressure is already severe.

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 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 respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Kenneth Mack  
King Cove / 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 proposed changes affecting the Area M fishery.

I am connected to both Anchorage and Sand Point, with family ties in Sand Point and King Cove. Considering the returns over the past three years, further reductions in Area M fishing opportunity would be a disaster. There is a strong possibility that we would not be able to cover basic operating costs for the season, including fuel, debt, and insurance.

The community of King Cove is already at the brink of folding, and any further reduction in fishing time could push this community deeper into financial jeopardy. The impacts of the past three years on the drift fleet show a significant decline in production, and additional restrictions would compound those losses.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines.

At 55 years old, I am returning to this fishery to help financially support my parents in Sand Point. This is not a retirement side job. Based on the past few years, I do not expect this season's returns to be much better, and any reduction in time on the water will further limit our ability to provide for our family.

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,  
Monty Mack  
Anchorage and Sand Point, AK  


**Submitted by:** Robert Mack

**Community of Residence:** King Cove

To whom it may concern;

My name is, Robert Mack, I am writing to the board today for you support of proposals before the board. The proposals im asking you to support are 113-115, 119, 121-125, 134, 135, 137-139, 142, 144-146, 150, 153-160, and 188. I am asking that you support these proposals as they will help my unungax people and unungax communities by creating more opportunities that have been taken away, and restoring wrongs by past boards. I am asking you to oppose these proposals 116-118, 120, 126-133, 136, 140, 141, 143, 147-149, 151, and 152. I ask that you oppose these proposals as they are pitting natives against each other and it is wrong. My unungax people have been blamed for far to long for things mother nature has only control of. We ask that this board like other past boards use the science to base their decisions. Thank you for your commitment to this process.

Sincerely,

Robert Mack

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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 Tanya Mack. I come from a family of fishermen—my grandfather and father were fishermen, and my husband, father-in-law, and brother-in-law all currently fish in Area M. We rely on this fishery to support our family financially and for subsistence. We are enrolled Tribal members of the Agdaagux Tribe of King Cove, and fishing in our ancestral waters is extremely important to my family and our culture.

My husband provides income and subsistence for our family and our daughters through fishing. We are grateful to be able to continue what our families have done for generations. Taking away any Area M fishing rights would affect our family in deeply detrimental ways through the loss of income, food security, and community stability.

The communities of Area M would be strongly affected by further restrictions. Families already face an extremely high cost of living, with expensive groceries and utilities. Without jobs tied to fishing, I fear families will be forced to move away, and our ancestral lands would no longer be lived on or cared for by the people who belong there.

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, climate and habitat stressors cannot be regulated away, and further restrictions would hit small rural coastal communities hardest.

Please consider the cultural, economic, and generational impacts these decisions will have on families like mine.

Thank you for your time and consideration.

Respectfully,

Tanya Mack  
King Cove, 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 Betti Malagon, and I am a family member of fishermen from King Cove, Alaska, in the Aleutians East region. I am writing to express my strong opposition to further restrictions on Area M fisheries.

Families in our region are already struggling to support themselves due to high costs of goods, housing, food, and fuel. Further reductions in fishing opportunity would make it increasingly difficult for families to remain in the region and support their basic needs.

Many younger families are already being forced to move away due to the lack of economic opportunity. Continued restrictions will accelerate outmigration and threaten the long-term survival of our communities. Fishing is the backbone of our regional economy, and Area M has already reduced chum harvest through adaptive management efforts.

The June Area M fishery is not the primary driver of Arctic–Yukon–Kuskokwim chum or Chinook declines. Climate and habitat stressors play a significant role, and removing management tools and flexibility only makes it harder to manage mixed-stock fisheries effectively.

Please consider the human and community impacts of further restrictions and support balanced, science-based management that allows families and communities to survive.

Thank you for your time and consideration.

Sincerely,

Betti Malagon  
King Cove, Alaska



**Submitted by:** Jacob Mannix

**Community of Residence:** Nome

Support Proposal 131. Efforts to maintain wild stocks of salmon alongside the developing world have been underway for hundreds of years. In Europe, as long ago as the year 1215 recognition of the challenges faced by salmon were met with efforts to ensure that salmon had a home in the developing world. As time progressed, the challenges that salmon faced continued to mount and consequently the efforts to maintain them also increased. Salmon conservation practices in Europe, even hundreds of years ago, recognized the importance of responsible fishing practices, fish passage, escapement, and habitat for the continuation of salmon. However, although laws were passed and discussions were held, the Atlantic Salmon in Europe failed. They are now extirpated from the majority of their natal streams and where they remain, they are a shadow of historic runs that fed generations of people and fueled continent wide economic activity.

The lessons from Europe were not learned or applied on the eastern seaboard of the United States. The same recognition of damage to salmon runs was noted quickly and the same discussions and laws were passed and yet again, salmon collapsed. All of these same patterns emerged on the western United States as development occurred and along with it, the destruction of habitat, blockage of rivers, and rampant over fishing. West coast runs of salmon are now a mere trickle of the historic runs that allowed native peoples and settlers to thrive. Our attempts at rehabilitation have been met with little success. Rivers are still prioritized for energy, commerce, and agriculture, commercial fishing continues, and hatcheries that were originally intended to rebuild wild stocks are now used to pump out high numbers of competing salmon in order to facilitate the current demand for what was at a time, a naturally replenishing resource.

Fortunately, in Alaska many of the problems that led to the collapse of other salmon fisheries across the world are not present. We have habitat for salmon to return to that is largely intact. The vast majority of our rivers are un-dammed and free flowing and we have the benefit of being able to learn from our past mistakes in order to take action and protect salmon for future generations. And yet, Alaska is in a salmon crisis. While we debate the overwhelming amounts of data and opinions attempting to find the most suitable, targeted solution, salmon numbers will continue to decline.

Continuation of viable, vibrant, and healthy runs of wild stock salmon in Alaska need only one thing to continue. We need to decide if we want salmon to be a part of our future. If the answer is yes, then we need to begin taking action to address two of the primary factors that are within our control, harvest and hatcheries.

On the large scale of salmon conservation, reducing harvest in the Area M fishery, a known intercept fishery, is a small step. But it is a recognition of the severity of our current situation and a necessary step towards conserving wild stocks of salmon. The Board of Fish should support Proposal 131.

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**Submitted by:** Andrew Manos  
**Community of Residence:** anchorage

Dear Members of the Board of Fish,

Thank you for the opportunity to share my perspective. We deeply appreciate your commitment to balancing conservation and the economic needs of local communities. However, I wish to highlight the profound challenges we are currently facing in the south peninsula.

It is important to note that most of the proposals in this cycle are not genuinely focused on conservation; instead, they seem designed to inflict harm on Area M. This approach undermines the livelihoods of those who depend on these fisheries and fails to address the broader needs of our communities.

It is essential to recognize that the south peninsula holds equal value to other regions whose economies and livelihoods are tied to the health and accessibility of our fisheries. Many of our communities are heavily dependent on fishing income for their survival. The burden of recent conservation measures has hit especially hard, and further cuts to our fishing time or area are simply untenable. Over the past three years, our June production has been lower than at any point in my career, with last year being the lowest on record for forty years. This has placed significant economic strain on families and businesses throughout the region.

Compounding these difficulties, the processor in King Cove stopped operating two years ago, further reducing opportunities for fishermen to market their catch and maintain their livelihoods. The loss of this processing facility has had ripple effects across our economy, increasing uncertainty and hardship in already vulnerable communities.

I encourage the Board to maintain a transparent process that respects scientific research while genuinely considering the voices of local communities and industry stakeholders. It is vital that you recognize both the ecological and social impacts of your decisions, and that all communities dependent on these fisheries are treated equitably. I hope we can continue working together toward solutions that safeguard our fisheries and ensure the future of those who depend on them.

Sincerely,

Andrew Manos

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## South Peninsula Adaptive Fleet Management Program 2022-2025 Program Performance Review

### 1.0 Executive Summary

- Adaptive management can meaningfully achieve conservation targets. It still uses time and area closures, but in a more informed and effective way. It has been a tool for fishermen to be good stewards and aid in the burden of conservation.
- No chum triggers were met in any of the years; most years were significantly below triggers due to conservative management and low volume runs.
- Consistent reductions in chum harvest. For all three years, harvest was below the respective 5-, 10-, and 20-year averages and significantly below the 2021 harvest prior to the program implementation. Years 2023 and 2025 had at least a 60% drop in YOY harvest level.
- Significant reductions from allowable regulatory fishing time
  - 2023: reductions of 38% in Shumagins and 12% in South Unimak from mandatory closures; combined with area specific and voluntary closures totaled 135.5 hours and 129.59 hours, respectively. Total of 14 closure events.
  - 2024: reductions of 55% in Shumagins and 7% in South Unimak from mandatory closures; combined with area specific and voluntary closures totaled 200.08 hours and 185.52 hours, respectively. Total of 26 closure events.
  - 2025: reductions of 16% in Shumagins and 26.5% in South Unimak from mandatory closures; combined with area specific and voluntary closures totaled 108.99 hours and 131.21 hours, respectively. Total of 35 closure events.
- Consistently achieved 100% seine participation all years; inadvertently resulted in decline in fishery participation (from 66 vessels in 2023 to 42 in 2025).

### 2.0 Background

Area M Seiners Association (AMSA) is a non-profit organization which represents the Area M seine and set gillnet permit holders who participate in the June and post-June Area M salmon fisheries. The Area M June salmon fishery is a mixed-stock fishery that has existed since before Alaska statehood, focusing primarily on sockeye harvest. Chum and other salmon are intermixed with the sockeye runs and are also caught in the fishery. Area M June chum harvests have been relatively stable in recent years, except for 2021 when chum harvest was unusually high. This anomaly was presumably due to a strong Asian chum presence and new participants in the seine fleet, which has been rectified through fleet education.

In 2022, AMSA conducted a unique and innovative self-management strategy that resulted in more than 50% reduction in chum harvest in June 2022 compared to June 2021. During the 2023 Board of Fisheries in-cycle meeting, AMSA proposed formalizing this program with explicit metrics outlined in RC104. The Adaptive Management Program was adopted in conjunction with additional reductions in fishing time and area, and two chum harvest triggers on June 18<sup>th</sup> and June 23<sup>rd</sup>, as outlined in RC190. This report is a comprehensive review of the program since inception.

### 3.0 Program Implementation

#### 3.1 Fishermen Board Management

The fishermen board's ("Board") purpose was to manage overall fleet harvest to optimize sockeye harvest and allow chum to pass through the fishing grounds. Board members were elected every year to ensure fair representation among all fleets delivering to various processors and to cover spatial distribution of

fishing grounds, with board members serving as conduits for updates from the fishing grounds. The Board typically met at least twice per day; in the evening to discuss a tentative fishing schedule for the following day and again in the morning to confirm the schedule after preliminary harvest data was uploaded to the portal for the previous day. The Board would then deliberate whether fleet-wide closures or more spatially targeted closures were necessary, using a combination of preliminary harvest data, number of vessels and fish tickets contributing to data, updates from fishing grounds, and harvest trends by non-seine gear. Once a closure was finalized, a Board member would log it into the portal and a notification email was sent to the entire fleet.

In 2023, the first formal year was characterized by a conservative management approach. Faced with low fish volumes early in the season, the Board implemented broad, fleet-wide mandatory closures. As the season progressed and it became clear that chum trigger thresholds would not be met, the strategy shifted to more targeted, voluntary stand-downs in specific areas, allowing vessels the flexibility to either wait or move to locations with lower chum presence. In 2024, the board began with a similarly conservative approach but quickly after the season started, chum presence became highly variable between fishing areas. This prompted a strategic shift away from fleet-wide actions toward an increased reliance on local area closures. These closures were mandated by Board members physically present in those specific areas, which allowed fishing to continue in areas with low chum encounters but with continued oversight from board members. The 2025 season was defined by extremely low volumes of both sockeye and chum salmon, rendering broad, area-wide closures unnecessary. Instead, the Board's strategy relied almost entirely on highly localized mandatory closures and individual voluntary stand-downs. The low fish abundance also meant that the fleet remained well below chum trigger thresholds, and consequently, no individual vessel accountability measures were enforced.

This progression demonstrates a clear trend toward more localized and flexible management actions, reflecting the program's increasing sophistication in adapting to real-time conditions.

### *3.2 Test Fishing*

In all three years, a cooperative test fishery was conducted with ADF&G to assess chum salmon abundance at 3 locations across the South Peninsula on June 8<sup>th</sup>, 9<sup>th</sup> and the 10<sup>th</sup> resulting in the loss of the first day of the June fishery for the seine and drift gillnet fleet. If the test fishery showed decreasing chum abundance and increasing sockeye abundance, the managing board will allow the seine fleet to fish a partial day on June 11<sup>th</sup> to gauge harvest with the entire fleet fishing. In 2023 and 2024, the board allowed partial fishing on the 11<sup>th</sup> but ultimately opted to close fishing later in the day. In 2025, the board allowed partial fishing on the 11<sup>th</sup> and asked individual board members to assess their respective fishing areas resulting in fishing in some areas and closures in others.

### *3.3 Data Portal Management*

A data portal was developed to formally document the decisions made by the board and provide internal data sharing within the fleet, to provide transparency on management decisions, and allow fishermen to track fleet-level performance and their own individual progress relative to the fleet. The Portal Manager (“PM”) was responsible for QA/QC of portal data. Every morning processors would submit preliminary harvest data from the previous day to ADF&G and into the portal. The PM would review these reports to ensure all processors had submitted, and check for any potential data entry errors. ADF&G staff were provided administrative access to the portal allowing managers to track what is occurring on the fishing grounds, and provide a secondary check on data. The portal has since been expanded to include several new tools, such as visual harvest trends, individual vessel report cards, species composition data, and vessel and fish ticket accounting. All participants were provided a login with access to fleet aggregated harvest data, live closure calendar, and personal report cards (no access to other individual harvester data).

### *3.4 Seine Fleet Participation*

The success of this program relies on 100% seine participation, which was guaranteed by the fleet requesting their processors mandate participation as a prerequisite for market access. Each year prior to June, each vessel is required to sign a binding agreement stating they understand the program's rules and will adhere to them. All three years had 100% participation, however, the total size of that active fleet has seen a steady decline over the review period dropping from 66 vessels in 2023, to 46 in 2024, and 42 in 2025. Having 100% participation is a major success, but the roughly 36% decline in fleet size illustrates the impact of such drastic closures. This also occurred during a period that also saw a major market disruption with the sudden closure of the Peter Pan Seafoods plant in 2024, pointing to other economic pressures on the fishery that exist in parallel to the adaptive management program.

### *3.5 Collaboration with the Concerned Area M Drifters (CAMF)*

Since 2023, the CAMF drift fleet has voluntarily stood down on June 10th as part of the broader management agreement. In 2024, the program's data portal was expanded to include the drift fleet, although adoption proved challenging due to fundamental differences in mobile fishing operations. A refined approach was implemented in 2025 where drift vessels could view seine closures on the portal and voluntarily log their own stand-downs via an online form. This initiative saw 28 drift vessels participate, collectively logging 554.75 hours of foregone fishing time. This total reflects a variety of factors beyond targeted chum conservation, with the source report attributing the hours to weather conditions (262 hrs), chum avoidance (155 hrs), religious holidays (105 hrs), and other operational reasons. Therefore, this voluntary, individually logged time is not intended as a direct comparison to the seine fleet's mandatory management program.

### *3.6 Processor Participation*

As part of this program, the seine fleet collectively requested that their respective processors mandate 100% participation from the fleet in order to have a market in June. This was accomplished via signed management agreements with the processors serving as the enforcing party in the agreement. The Board consulted with processors to develop a tender sampling design with minimum requirements, although for larger deliveries processors often opted for more robust sampling. When possible, average weights were calculated from samples and extrapolated to the delivery using internal worksheets. These data were transmitted to the plant, where plant staff develop preliminary harvest reports that are submitted to the ADFG Area Management Biologists for in-season reporting and to the data portal each morning. Processors were in constant communication with the fishermen board and portal manager to troubleshoot fish tickets and ensure timely reporting. Processors were essential to the successful execution of the ADF&G genetics sampling program, providing logistical support for samplers.

### *3.3 New Initiatives*

In 2025, the program demonstrated its flexibility by voluntarily expanding its scope to address an external management need. In direct response to ADF&G Emergency Order #4-FS-M-SP-04-25, the seine fleet leveraged the data portal's infrastructure to monitor Chinook salmon harvest through July in the Shumagin Islands. This initiative extended the portal's functionality beyond its typical June timeframe, showcasing the system's potential as a responsive, multi-species monitoring tool.

## **4.0 Comparative Analysis of Harvest and Conservation Metrics**

The program's fundamental purpose is to balance two objectives: optimizing the harvest of valuable sockeye salmon and implementing effective conservation measures to allow chum salmon to pass through

the fishery. This section quantitatively assesses the program's performance against these goals by analyzing the conservation efforts and harvest results from 2023 through 2025.

#### *4.1 Foregone Fishing Time and Closure Events*

A primary metric for conservation effort is the amount of fishing time the fleet foregoes beyond regulatory requirements. Three types of closures were used depending on the circumstances. Full fleet mandatory closures were issued for either the entire Shumagins section, South Unimak section, or both (all areas). Area specific closures were also mandatory for smaller areas, but fishermen were allowed to move to other open areas. Individual voluntary closures were logged by one (or more) fishermen who chose to standdown independent of a board mandated closure. Area specific closures were heavily utilized in South Unimak due to the wide dispersion of fishing sites, whereas it was easier to do a full Shumagins closure as sites are closer.

In 2023, the Shumagins had 77 hours of regulatory closures and 40 hours of mandatory full fleet closures, resulting in a **38% reduction** in fishing time from regulation not including 18.5 hours of area specific closures; South Unimak had an additional 37 hours of mandatory full fleet closures, resulting in a **12% reduction** in fishing time from regulation not including the 92.59 hours of area specific closures.

In 2024, the Shumagins had 121 hours of regulatory closures and 56.93 hours of mandatory full fleet closures, resulting in a **55% reduction** in fishing time from regulation not including 22.15 hours of area specific closures; South Unimak had an additional 23 hours of mandatory full fleet closures, resulting in a **7% reduction** in fishing time from regulation not including the 162.52 hours of area specific or voluntary closures.

In 2025, the Shumagins had 50.2 hours of mandatory full fleet closures, resulting in a **16% reduction** in fishing time from regulation not including 58.79 hours of area specific closures; South Unimak had an additional 82.26 hours of mandatory full fleet closures, resulting in a **26.5% reduction** in fishing time from regulation not including the 48.95 hours of area specific closures.

Over the three-year period, the number of individual closure events have steadily increased, indicating a growing commitment to in-season conservation action. The data reveals a clear upward trend in the number of individual conservation actions, from 14 events in 2023 to 35 in 2025. While the number of closures does not necessarily equate to meaningful conservation benefit, the data demonstrates a sustained and significant conservation effort by the seine fleet each year. The strategy has evolved over time to not focus just on rigid metrics such as ratios or absolute harvest, but instead to find opportunities to conserve chum on a fine scale while considering the bigger picture (e.g. current harvest levels, accrual towards triggers, where and when fishing is occurring, how many vessels are in an area, etc.).

Table 1. Summary of closures and foregone fishing hours

2023 Closure events: 14		Additional ADFG Regulatory Closures	Full Fleet Closures Hours		Area Specific Closure Hours		Total Additional Closed Fishing Hours	
Period Start	Regulatory Fishing Hours	Shumagins	Shumagins	South Unimak	Shumagins	South Unimak	Shumagins	South Unimak
10-Jun	68		23.5	27.5	10.5	11	34	38.5
16-Jun	66	33	5	9.5		22.84	38	32.34
20-Jun	88	44	11.5			36.75	55.5	36.75
25-Jun	88				8	22	8	22
<b>Total</b>	<b>310</b>	<b>77</b>	<b>40</b>	<b>37</b>	<b>18.5</b>	<b>92.59</b>	<b>135.5</b>	<b>129.59</b>
2024 Closure events: 26		Shumagins	Shumagins	South Unimak	Shumagins	South Unimak	Shumagins	South Unimak
10-Jun	68		56.93	23		66.37	56.93	89.37
16-Jun	66	33				46.92	33	46.92
20-Jun	88	44					44	0
25-Jun	88	44			22.15	49.23	66.15	49.23
<b>Total</b>	<b>310</b>	<b>121</b>	<b>56.93</b>	<b>23</b>	<b>22.15</b>	<b>162.52</b>	<b>200.08</b>	<b>185.52</b>
2025 Closure events: 35		Shumagins	Shumagins	South Unimak	Shumagins	South Unimak	Shumagins	South Unimak
10-Jun	68		29	49.78	20.9	25.95	49.9	75.73
16-Jun	66		21.2	11.03	26.02	7.5	47.22	18.53
20-Jun	88					15.5		15.5
25-Jun	88			21.45	11.87		11.87	21.45
<b>Total</b>	<b>310</b>	<b>0</b>	<b>50.2</b>	<b>82.26</b>	<b>58.79</b>	<b>48.95</b>	<b>108.99</b>	<b>131.21</b>

#### 4.2 Sockeye and Chum Salmon Harvest Results

Despite increasing conservation efforts, harvest levels for both sockeye and chum salmon have demonstrated high volatility, influenced by significant year-to-year fluctuations in fish abundance.

The harvest data shows dramatic swings, with a 112% increase in total chum harvest from 2023 to 2024, followed by a 62% decrease from 2024 to 2025. When compared to historical benchmarks, harvests for both chum and sockeye salmon were consistently below 10- and 20-year averages, with 2024 being a relative exception for chum. Despite significant and increasing conservation efforts, harvest levels remained volatile and generally below historical averages, leading to the conclusion that external abundance factors are primary drivers of seasonal outcomes.

Table 2. Chum harvest results

Year	Chum Harvest				Relative Change (% difference)			
	Harvest*	5-yr avg	10-yr avg*	20-yr avg*	YOY %	5-yr	10-yr	20-yr
2023	205,522	657,873	516,878	457,826	-62	-68.8	-60.2	-55.1
2024	450,839	591,484	497,525	453,981	119	-23.8	-9.4	-0.7
2025	156,136	571,837	503,595	452,407	-65	-72.7	-69.0	-65.5

\* Harvest data sourced from ADF&G Annual Management Reports 2023-2025

#### 5.0 Key Findings and Observations

This three-year review of the Area M Adaptive Fleet Management Program synthesizes the most critical findings to provide a holistic view of the program's performance. The analysis yields several key observations that should inform future program strategy.

- **Adaptive = Informed Closures:** This program proved to be a solution that can achieve the **same time and area closures** sought by Board of Fish proposals, but using more informed closure timing, and without completely devastating the fishery. The program's evolution from using blunt regulatory time and area closures pre-2022, to more rigid fleet-wide closures in 2023, to real-time, localized actions by 2025, prove the adaptive framework is functioning as designed and can achieve conservation goals. This maturation in responsiveness shows a growing capacity to tailor conservation measures to specific, on-the-water conditions.
- **Sustained Conservation Efforts:** The consistent application of foregone fishing time, evidenced by the marked decrease in chum harvest combined with the consistent number of closure events, confirms a significant and sustained commitment to chum avoidance by the seine fleet under the program's framework.
- **Declining Seine Fleet:** A notable impact has emerged. While program participation remains at 100% among the active fleet, the absolute number of participating vessels has declined from 66 in 2023 to 42 in 2025. This trend is likely a combination of the challenge of sustaining a fishing operation under this program, while simultaneously managing external economic/market pressures impacting the fishery.
- **Positive Fleet Collaboration:** The growing participation of the CAMF drift fleet is a positive development. Their voluntary use of the program's data portal and self-tracking standdowns signal a commitment to conservation and cooperative potential beyond the original program participants. While the drift fishery operates differently and will require a tailored approach to conservation, seeing engagement and cooperation among such varied stakeholders is a major achievement seldom seen in fisheries.

**Submitted by:** Thomas Manos  
**Community of Residence:** Girdwood Alaska

Email to Alaska Board of Fisheries

Dear Alaska Board of Fisheries,

I am writing to you regarding area and time restrictions.

Proposals 127,128,129,131,136

I adamantly oppose these proposals.

If adopted these proposals will do great harm Area M Salmon fishermen and without a doubt cause some these small fishing businesses to fail.

These closures have been shown to have a statistically insignificant benefit to any other area in Alaska they will create zero relief for any fishing group and a great deal of harm for Area M Fishermen many of whom are just hanging on.

Proposals 130,132,133

I oppose these proposals

It is ironic that Chignik area fishers would make these proposals. In 2025 Chignik fishermen fished almost continuously . The only reason that many of these fishers were able to sell fish in 2024 and 2025 is because Silverbay Seafoods False Pass agreed to tender and buy their fish. Without The fish caught in Area M, Silverbay would not be able to operate' It is clear that like any salmon fishery there are good years and bad years and Area M has a very small impact on the Chignik Fishery and no impact on the health of the resource

Proposals 134 and 135

I support these proposals.

I personally helped develop successful King Salmon non retention protocols in Southeast Alaska in the 1980s There were research studies that proved that there is a very low mortality rate for Kings that are released as soon as possible after being brought aboard a Purse Seiner.

Sincerely,

Tom Manos

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PC120

**Submitted by:** David Martishev

**Community of Residence:** Voznesenka

I strongly oppose proposal 116. This is not a science based proposal, but a personal gain one. These proposals have been voted against in past numerous times and should be done so again. Restricting fishing to 1.5 miles will destroy the north side fishery. Due to weather, most of the time fishermen can't fish that close due to dangerous waves. North side fishery has no bays to fish in, it's all open ocean. Restricting fishing for 96 hours and hoping the rest of the week will be calm enough to fish is ludicrous. Passing the proposal will be the end of the drift fishery as we know it. No cannery will commit a tender fleet with these restrictions. This proposal comes after Nelson River had a historic two years of fish go up the river and over escaping it beyond belief. This makes me sad that a proposal like this was even made, especially when the upper drift fleet seen a historic 3 year low in catch. Please don't forsake this fishery, this drift fleet is already hanging on by a thread. This would be the final nail in the coffin

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PC121

**Submitted by:** Ilia Martushev

**Community of Residence:** Homer Alaska

hi my name is Ilia Martushev, I was born and raised in Homer Alaska and still reside in Homer, I've fished area m for 16 years and would love to continue to do so, I'm a 4th generation fisherman and would love to pass this fishery on to my children, thank you for your time

---

PC122

**Submitted by:** Paul Martushoff

**Community of Residence:** Spokane wa

To whom it may concern:

Hello, My name is Paul.Martushoff on the F/v Orbit. I've been fishing in Area M since 2001 started with my dad as a deckhand and have been running my own gillnet boat for the last 20 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.

---

**Submitted by:** Maxine Mazza

**Community of Residence:** Anchorage, AK

Hello, my name is Maxine Mazza, and I live in Anchorage, Alaska. I am submitting my comments today in strong and unequivocal opposition to any proposal that would sharply reduce fishing time or opportunity in Area M. I grew up in King Cove, Alaska, and I still have family who live there today. Fishing is not an abstract issue for my family or my community—it is their livelihood.

Let me be absolutely clear: Area M and the surrounding communities are critically dependent on this fishery. It is not optional. It is not expendable. It is a foundational economic, cultural, and community lifeline. Any reduction in access or opportunity would cause immediate and lasting harm to the people, families, and communities who rely on it to survive. These impacts would be severe, disproportionate, and unacceptable.

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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:

Hello, my name is Maxine Mazza, and I live in Anchorage, Alaska. I am submitting my comments today in strong and unequivocal opposition to any proposal that would sharply reduce fishing time or opportunity in Area M.

I grew up in King Cove, Alaska, and I still have family who live there today. Fishing is not an abstract issue for my family or my community—it is their livelihood.

Let me be absolutely clear: Area M and the surrounding communities are critically dependent on this fishery. It is not optional. It is not expendable. It is a foundational economic, cultural, and community lifeline. Any reduction in access or opportunity would cause immediate and lasting harm to the people, families, and communities who rely on it to survive. These impacts would be severe, disproportionate, and unacceptable.

Further restrictions would hit small rural coastal communities the hardest and affect everyone who lives in these 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 consideration.

Respectfully,

Maxine Mazza  
Anchorage, Alaska



To Members of the Alaska Board of Fisheries,

My name is John McCarty. I grew up in Sand Point, Alaska, and began fishing with my family at the age of nine. I was born and raised in Sand Point, and from ages nine to eighteen I worked as a commercial fisherman during the summer seasons, fishing with multiple uncles and captains. These experiences shaped my values, work ethic, and commitment to responsibility.

I am submitting this comment in opposition to proposals that would further reduce fishing opportunity in Area M.

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.

During my time fishing, the income I earned helped support my household, including rent and basic living expenses. Reducing fishing time in Area M would significantly harm the local economy and place many families at risk of losing their livelihoods.

My experience as a commercial fisherman in Area M provided me with values and discipline that prepared me for a 23-year career in the United States Navy, specializing in submarine engineering. I retired as a Senior Chief (E-8), a rank achieved by only a small percentage of Navy personnel. I attribute much of that success to the work ethic, accountability, and perseverance instilled in me through fishing and mentorship in the Area M fleet.

Further restrictions would not only damage coastal economies, but would also deprive young people of opportunities to develop critical life skills—hard work, resilience, and responsibility—that translate far beyond the fishery. Area M has already reduced chum harvest through adaptive management, and further restrictions would disproportionately harm small rural communities without addressing the root causes of salmon declines.

Thank you for considering the real impacts these decisions have on families, communities, and future generations.

Respectfully submitted,

John McCarty  
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 Gregory McGlashan. I am a tribal member of St. George Island and a shareholder of The Aleut Corporation. The Aleutians and the Pribilof Islands are my home, as well as my daughter's place of heritage.

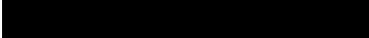
Although I am retired from work in the fisheries, this is still deeply tied to my family and our future. The cost of living in these villages is directly tied to the fisheries. Without the fisheries, these villages would be forced to shut down or become dependent on state or federal assistance.

Fishing supports cannery jobs, vessel operations, and the many other jobs connected to the industry. If Area M is closed off or further restricted, it would effectively mean killing off these villages.

Further restrictions would hit small rural coastal communities the hardest.

Thank you for the opportunity to comment.

Respectfully,

Gregory McGlashan  


**Submitted by:** Samantha McNeley

**Community of Residence:** Nelson Lagoon

I oppose proposal 113 because the size of the fish were too small in 2024 to be caught and that's why it was such a high escapement. It was not for lack of trying. ADF&G website also states that 87% of the fish escaped in Nelson Lagoon in 2024 were 1 and 2 year fish.

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**Submitted by:** Sherman McNeley

**Community of Residence:** Nelson Lagoon

My comment is on proposal 113, it states that if Nelson Lagoon is expected to reach its escapement goals before August 1st the Caribou Flats section will be open to fishing by emergency order from June 20th to July 31st.

The 2024 salmon season looks like a great season on paper, but the harvest and the escapement really didn't match up. The fish, though large in number, were small in size. I witnessed fish hitting the net, but many were not caught. Many appear to be 1&2-year-old fish which is alarming, due to returning so early. This is especially concerning for future seasons. Opening another area to stop these young, returning fish is not sustainable, and could devastate our community by eventually preventing us from fishing entirely. This proposal seeks to allow more fishing where it is not necessary, in an area that has not been open in over 40 years; therefore I am opposed to this proposal.

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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 Rodney Mellin, and I am from King Cove, Alaska.

I am submitting this comment to express my concern about further restrictions on Area M fisheries.

Thank you for your time and consideration.

Respectfully,

Rodney Mellin  
King Cove, 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 Benjamin Mobeck Jr. I was born in Alaska and raised in Sand Point, and I am a third-generation fisherman. I have set gillnets in Area M and have been part of this community my entire life.

Any changes that reduce fishing opportunity in Area M will directly impact my family, as most of my household income is earned during the summer salmon season. With less income, it becomes difficult to pay for utilities, food, and ongoing repairs that are always needed.

Fishing time is already limited, and bad weather forces fishermen to take risks in order to make a living. When fishing time is lost, there is no opportunity to make it up, resulting in lost income and increased safety risks.

Area M has already reduced chum harvest through adaptive management. Salmon runs vary by river system, and Area M is not the primary driver of AYK 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.

Thank you for your time and consideration.

Respectfully,

Benjamin Mobeck 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 Benjamin Mobeck Sr. I am a longtime fisherman from Sand Point, originally from Sanak Island. Fishing has been my livelihood for over 70 years. This is the only way I make money during the summertime, if there is enough time to fish.

If the Board reduces time, area, or opportunity in Area M fisheries, I will not have enough money to pay my bills, cover my fishing business expenses, or meet my living costs. I do not want to move. I am too old for that. I do not want to go on welfare. I want to fish.

Businesses are already closing in the community, and more will close if fishing time is reduced further. Fishing operations will go bankrupt, schools will close as incomes decrease and expenses increase, and families will be forced to move away. Over the past few years, I have seen the economy slow and people leave in search of work.

Area M is over 100 miles away from the AYK region. No one knows exactly where all the fish go. It is a big ocean.

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 considering the impact these decisions will have on people like me who depend on this fishery to survive.

Respectfully,

Benjamin Mobeck Sr.  
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 Board of Fisheries:

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

I am a resident, boat owner, and permit holder in the Sand Point Area M region. I grew up in Sand Point, and my family history is rooted in the Alaska Peninsula and the Shumagin Islands. My parents moved from Sanak Island, and our family has long-standing ties to this region and its fisheries.

Further reductions in Area M fishing opportunity would directly affect my ability to stay in the community and earn an income. Local businesses would be forced to close if fisheries are shut down, which would greatly diminish funding for our schools and negatively affect future students.

I have already had to shut down my local remodeling and construction business due to low income and the reduced flow of regulated fishing income into the community. These impacts are already being felt, and additional restrictions would worsen the situation.

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 one area—Area M—is not the cause of the decline of these fish migrating through our region.

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,  
Emil Mobeck  
Sand Point, AK



**Submitted by:** Connor Murphy

**Community of Residence:** Kodiak, AK

107) Oppose. There is no personal use fishery on the Alaska Peninsula, Aleutian Islands or Chignik areas. The subsistence fishery in these areas already has reporting and fish marking requirements in place already. I encourage the proposer, an advisory committee, to read the Alaska Peninsula, Aleutian Islands and Chignik Area Finfish regulations before submitting a proposal.

113) Support. With harvest effort in Nelson Lagoon Section decreasing, ADFG will be able to utilize this as a tool to mitigate over escapement of the Sapsuk (Nelson) River by offering harvest opportunities closing to Nelson Lagoon to outside set netters and drift fleet.

114) Support.

115) Support.

116) Oppose. The only ones fishing from 24/7 from June to July the last 3 seasons are Nelson Lagoon fishermen. I would say this would create further hardship and put stakeholders of this fishery out of business but the commercial fishery closures on the North Peninsula from ADFG due to the lack of abundances the past 3 seasons have already done that. There is zero reason for the BOF to step in with regulations to create mandatory closures for North Alaska Peninsula salmon fisheries when ADFG already restricts the fishery and closes down for escapement purposes. When there is as an abundance of salmon this proposal will tie the hands of ADFG from creating openers to prevent over escapement in the river systems of the North Peninsula which do not handle over escapement well and crash 3-4 years later and hurt the sustainability of the resource over the long term.

117) Oppose.

118) Oppose.

126) Oppose.

127) Oppose. This proposal will absolutely devastate the communities and businesses on the Alaska Peninsula who have been battling low harvest and depressed fish prices the past 3 years. There is zero science that this will help struggling stocks of the Arctic/Yukon/Kuskokwim (AYK) region satisfy their escapement objectives but will guarantee further hardship to the communities and stakeholders who rely on the June salmon fishery. The salmon run failures in the AYK region have been scientifically to be a cause from by a myriad of natural and environment factors however, the economic injury that will be caused by this proposal to the communities and stakeholders on the Alaska Peninsula region will be solely on the Board of Fisheries if adopted.

128) Oppose. The proposal request to implement bycatch closures for Koyukuk Chum, Chinook, and Coho salmon when there is no way to identify these stocks in the harvest in Alaska Peninsula fisheries.

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129) Oppose. This proposal will absolutely devastate the communities and businesses on the Alaska Peninsula who have been battling low harvest and depressed fish prices the past 3 years. There is zero science that this will help struggling stocks of the Arctic/Yukon/Kuskokwim (AYK) region satisfy their escapement objectives but will guarantee further hardship to the communities and stakeholders who rely on the June salmon fishery. The salmon run failures in the AYK region have been scientifically to be a cause from by a myriad of natural and environment factors however, the economic injury that will be caused by this proposal to the communities and stakeholders on the Alaska Peninsula region will be solely on the Board of Fisheries if adopted.

130) Oppose.

131) Oppose. This proposal will absolutely devastate the communities and businesses on the Alaska Peninsula who have been battling low harvest and depressed fish prices the past 3 years. There is zero science that this will help struggling stocks of the Arctic/Yukon/Kuskokwim (AYK) region satisfy their escapement objectives but will guarantee further hardship to the communities and stakeholders who rely on the June salmon fishery. The salmon run failures in the AYK region have been scientifically to be a cause from by a myriad of natural and environment factors however, the economic injury that will be caused by this proposal to the communities and stakeholders on the Alaska Peninsula region will be solely on the Board of Fisheries if adopted.

132)Oppose. This proposal will absolutely devastate the communities and businesses on the Alaska Peninsula who have been battling low harvest and depressed fish prices the past 3 years. There is zero science that this will help struggling stocks of the Arctic/Yukon/Kuskokwim (AYK) region satisfy their escapement objectives but will guarantee further hardship to the communities and stakeholders who rely on the June salmon fishery. The salmon run failures in the AYK region have been scientifically to be a cause from by a myriad of natural and environment factors however, the economic injury that will be caused by this proposal to the communities and stakeholders on the Alaska Peninsula region will be solely on the Board of Fisheries if adopted.

133) Oppose. This proposal will absolutely devastate the communities and businesses on the Alaska Peninsula who have been battling low harvest and depressed fish prices the past 3 years. There is zero science that this will help struggling stocks of the Arctic/Yukon/Kuskokwim (AYK) region satisfy their escapement objectives but will guarantee further hardship to the communities and stakeholders who rely on the June salmon fishery. The salmon run failures in the AYK region have been scientifically to be a cause from by a myriad of natural and environment factors however, the economic injury that will be caused by this proposal to the communities and stakeholders on the Alaska Peninsula region will be solely on the Board of Fisheries if adopted.

134). Support

135) Support

136) Oppose. This proposal will absolutely devastate the communities and businesses on the Alaska Peninsula who have been battling low harvest and depressed fish prices the past 3 years. There is zero science that this will help struggling stocks of the Arctic/Yukon/Kuskokwim (AYK) region satisfy their escapement objectives but will guarantee further hardship to the communities and stakeholders who rely on the June salmon fishery. The salmon run failures in the AYK region have been scientifically to be a cause from by a myriad of natural and environment factors however, the economic injury that will be caused by this proposal to the communities and stakeholders on the Alaska Peninsula region will be solely on the Board of Fisheries if adopted.

147) Oppose. This would cost fishermen several thousand each to be compliant when many are still trying to recover from losses of the past 3 years.

149) Support. Set net fisherman should be able to use as many or as few nets as along as they do not exceed the total aggregate of 200 fathoms unless specified otherwise.

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150) Support. I authored the monofilament proposal for the North peninsula last cycle and used monofilament gear for two of those seasons. I found that monofilament catch rate is not anymore efficient than multifilament web but it does clean marine vegetation faster with a pressure washer than multifilament will being about 1/3 of the cost. Personally, I will switch back to multifilament because monofilament is not durable and I go through about 3 times the nets in a season than I would used to. Monofilament is a nice tool for when there is a lot of algae around and the south peninsula set net fishermen should be able to use monofilament as well.

151) Oppose. This would make the fishery less safe. I set net on the peninsula without a lead because regulations do not all it, I can tell you picking fishing in the skiff in the breakers right of the beach is dangerous. We should not make the industry less safe, if anything we should armed this proposal to include the Northern district so I can use a lead too.

153) Support. I authored the monofilament proposal for the North peninsula last cycle and used monofilament gear for two of those seasons. I found that monofilament catch rate is not anymore efficient than multifilament web but it does clean marine vegetation faster with a pressure washer than multifilament will being about 1/3 of the cost. Personally, I will switch back to multifilament because monofilament is not durable and I go through about 3 times the nets in a season than I would used to. Monofilament is a nice tool for when there is a lot of algae around and the south peninsula set net fishermen should be able to use monofilament as well.

**Submitted by:** Meesha Murphy

**Community of Residence:** Kodiak

I have two family members who are Area M permit holders (set gillnet) and am opposed to proposals that needlessly want to reduce fisheries without any scientific basis which it appears that all those submitted by entities trying to curtail and limit fisheries meet that criteria.

I am supportive of proposals submitted by local fishing groups like CAMF and the Area M seiners which seek to improve local fisheries. With regard to the King Salmon sport fishery I support regulations that protect King Salmon in the rivers by providing opportunity for the sport fishermen but preventing retention of fish. North Peninsula rivers have healthy king salmon runs and they should be kept that way by not allowing harvest on most of these systems which have small run sizes. I support Proposal 156 with an amendment that was approved by the Nelson Lagoon AC for no retention of any king salmon including those under 20 inches for the entire Alaska Peninsula area which the local lodges support.

**Submitted by:** Thomas Murtha

**Community of Residence:** Eagle Nest ,NM

I oppose proposals 127 through 136. They all propose to eliminate or severely restrict the Area M June salmon fishery. Proposals like these have been at every BOF meeting I have attended during my 40 years fishing Area M. At all these meetings federal and state biologists have stated that in river and ocean conditions have far more to do with AYK chum survival than does the harvest on those stocks by Area M fisherman. Yet at every meeting we face the loss of a large portion of our salmon season, a very heavy burden of conservation. On the North Peninsula I support proposals 113, 114 & 115 they will help ADFG better manage our local stocks. I strongly oppose proposal 116 which proposes to close half the North Peninsula outside fishing districts for over half the time. This is being asked for to protect Nelson Lagoon which has vastly exceeded the upper end of its escapement goal the last 2 years. This is totally unnecessary.

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Native Village of Belkofski  
P.O. Box 57  
King Cove, Alaska 99612  
Phone: 907-497-3122/Fax: 907-497-3123  
[kcbtc@arctic.net](mailto:kcbtc@arctic.net)

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

The Native Village of Belkofski submits this testimony to share the perspective of a small, historic Unanga community whose continued existence is inseparable from access to nearby fisheries. For Belkofski, fisheries management decisions are not abstract policy discussions—they directly affect whether our people can remain connected to our homeland, culture, and way of life.

Belkofski has endured decades of economic loss, population decline, and reduced infrastructure. Like many communities along the Alaska Peninsula, the departure of fish processing capacity and limited employment opportunities have left few paths toward economic stability. Fishing remains one of the last viable means for sustaining families, supporting Tribal members, and maintaining a connection to place. When fishing access is reduced, the impacts extend well beyond individual permit holders and affect the entire community.

Our ancestors have lived alongside these waters for generations, developing a deep understanding of seasonal patterns, species behavior, and responsible harvest practices. This traditional knowledge continues to guide how our people engage with the fishery today. Conservation and stewardship are not new concepts to Belkofski, they are values embedded in our culture. Management decisions that overlook Indigenous knowledge risk weakening long-term outcomes rather than strengthening them.

Additional restrictions imposed on already limited fishing areas threaten to further destabilize communities like Belkofski. For a village that has already lost so much, the loss of fishing opportunity is not merely an inconvenience, it undermines food security, cultural transmission, and economic survival. Effective fisheries management must consider the cumulative burden placed on rural and Tribal communities, especially those with few alternatives.

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

The Native Village of Belkofski opposes the following proposals: 108, 109, 110, 111, 112, 116, 120, 126, 127, 128, 129, 130, 131, 132, 136, 140, 141, 143, 148, and 152.

Belkofski supports fisheries management approaches that are flexible, adaptive, and grounded in real-world conditions. The adaptive management framework adopted by the Board in 2023 reflects these principles and provides a balanced approach that allows fishermen to respond responsibly to environmental and operational realities while

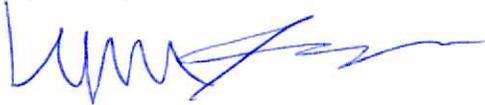
continuing to provide for their families and communities. Maintaining this framework offers stability and predictability that are essential for small, rural villages.

Belkofski's relationship to the fishery is longstanding and responsible. Our community has consistently participated in Alaska's fisheries with respect for the resource and with future generations in mind. Management decisions that acknowledge this history help ensure conservation goals are met without sacrificing the survival of rural and Tribal communities.

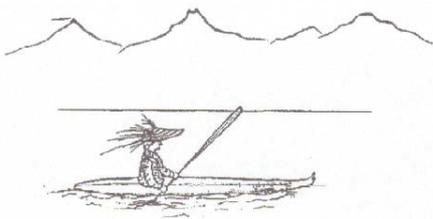
We ask the Board to consider the human dimension of fisheries management and to recognize that strong fisheries depend on strong fishing communities. When policies allow communities like Belkofski to remain viable, they preserve not only economic opportunity, but also culture, language, and identity.

Thank you for your time and for considering the perspective of the Native Village of Belkofski. We appreciate the Board's commitment to stewardship and urge that this commitment continue to include the people who have lived with and cared for these fisheries for generations.

Respectfully submitted,



Lynn Farr  
President, Native Village of Belkofski



## Native Village of False Pass

### **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](mailto:dfg.bof.comments@alaska.gov)

### **RE: Comments by the Native Village of False Pass for Alaska Peninsula, Aleutians, & Chignik Finfish Meeting, February 2026**

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

On behalf of the Native Village of False Pass, we submit this written public comment to emphasize the Board's responsibility to uphold science-based fisheries management and to share the perspective of a small, remote Unanga community that has had to continually fight for its cultural, economic, and physical survival within the State of Alaska.

False Pass is not simply a fishing community; it is a living extension of the waters and lands that surround it. Our people are Unanga derived from these seas, shaped by them, and bound to them by thousands of years of continuous use and stewardship. Fishing is not an abstract economic activity for us. It is food security, intergenerational knowledge, cultural survival, and the foundation of our local economy. When access to fisheries is reduced without scientific justification, it is our community that bears the heaviest burden.

We respectfully remind the Board that its mission is to create fisheries policy based on the best available scientific information, not regional allegiance, political pressure, or the interests of outside entities. When decisions depart from science, the consequences fall disproportionately on small Indigenous communities like False Pass, communities that have already endured decades of regulatory instability, economic loss, and population decline.

We acknowledge and empathize with the hardship experienced by communities in other regions that are seeing poor salmon returns in their river systems. However, the scientific record does not support the claim that Area M fisheries are responsible for those declines. Extensive genetic stock identification, escapement data, and peer-reviewed research consistently demonstrate that harvest rates on Western Alaska chum stocks in Area M are low and not a primary driver of reduced productivity. Climate-driven factors, marine heat waves, warming freshwater temperatures, disease, changing prey availability, permafrost degradation, and increasing marine predation, are well-documented causes of reduced salmon survival across Alaska and the North Pacific.

Area M fishermen and communities, including False Pass, have not ignored these concerns. To the contrary, our region has taken proactive, voluntary, and science-informed action. The Area M adaptive management program, endorsed by this Board, has resulted in substantial reductions in chum harvest through real-time fleet communication, voluntary stand-downs, and targeted fishing behavior. These

NATIVE VILLAGE OF FALSE PASS

PO Box 29 False Pass, AK 99583 • Phone: (907) 548-2227 • Fax (844) 206-9004 • Email: [office@fptribe.net](mailto:office@fptribe.net)

actions have come at real economic cost to our fishermen and processors, yet they demonstrate good-faith stewardship and a commitment to conservation that should be recognized, not punished .

False Pass and other Eastern Aleutian communities are already facing severe economic stress. Declining fish prices, the closure of processing facilities, and reduced local employment threaten the viability of our village. Fishing revenue supports not only individual families, but also local governments, schools, infrastructure, and basic services. Further reductions to time and area in Area M, unsupported by science, risk pushing communities like ours past a point of recovery.

We urge our neighboring regions to engage with us directly. Sit down with us. Visit our community. Learn about our waters, our fishing practices, and our stewardship ethic. You will see that we are not adversaries, we are people deeply invested in the long-term health of salmon and the ecosystems they depend on. Collaboration grounded in respect and science, not blame, is the only path forward.

For these reasons, the Native Village of False Pass supports the following proposals:  
107, 113, 114, 119, 121, 122, 123, 124, 134, 137, 138, 139, 142, 144, 145, 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, 152

We respectfully ask the Board to uphold its obligation to science-based management, to reject policies rooted in misattribution and regional division, and to consider the long-term cultural, ecological, and community impacts of its decisions. The survival of small Indigenous communities like False Pass depends on it.

Respectfully submitted,

-



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Travis Hoblet  
President



## UNGA TRIBAL COUNCIL

P.O. Box 508  
Sand Point, Alaska 99661

(907) 383-2415 / 5553 Facsimile  
ungatribe@arctic.net

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### RESOLUTION 26-12

**A RESOLUTION OF THE NATIVE VILLAGE OF UNGA (UNGA TRIBAL COUNCIL) OPPOSING UNFAVORABLE RESTRICTIONS, REDUCED FISHING TIMES ALONG WITH NEGATIVE IMPACTS ADVERSELY AFFECTING OUR FISHERMEN AND COMMUNITIES IN AREA M DURING THE ALASKA PENINSULA/CHIGNIK BOARD OF FISH MEETINGS BEING HELD FEBRUARY 2026.**

- WHEREAS,** the Native Village of Unga (Unga Tribal Council) is a sovereign, federally recognized Tribe and the Unga Tribal Council is the governing body of the Tribe; and
- WHEREAS,** the Unga Tribal Council acknowledges the significance of the established long-standing fisheries in the Eastern Aleutians, a fishery that our Unangan ancestors have utilized for over 9,000 years for both subsistence and commercial purposes; and
- WHEREAS,** our fishermen have faced adverse obstacles that have been put forth upon them and no other area within the State of Alaska has been constantly under attack from others whenever fish are missing, we Eastern Unangan Aleuts automatically are blamed for conservation problems occurring in other areas; and
- WHEREAS,** for our Indigenous Unangax fishermen working in Area M of the Eastern Aleutians, this fishery is essential to the economic well-being of our people, our communities, our way of life, and our mainstay economy; and
- WHEREAS,** the challenges of the AYK Arctic Yukon Kuskokwim crisis will not be effectively solved by shutting down, closing or significantly limiting the fishing activities of our Indigenous fishermen and communities solely to support the sustainability and survival of other fisheries; and
- WHEREAS,** research strongly states poor marine smelt survival is linked to the changing oceanic conditions, extreme warm ocean temperature, the lack of available food sources all contributing to the decline in fish, notably not the fishery we are dependent upon, the Area M fishery; and

**WHEREAS,** salmon declines are complex in nature, our oceans are huge, the diminishing of a species is complex in nature, accurate representation of precise data and scientific analysis must be central to any decisions regarding a fishery, entailing a larger scope of area not targeting one specific area; and

**WHEREAS,** we are opposed to Proposals 108, 109, 110, 111, 112, 116, 120, 126, 127, 129, 130, 131, 132, 133, 136, 140, 141, 143, 148, and 152, proposals threatening our livelihood, our culture, our ability to provide for our families, our existence within the area if passed having an adverse effect on the economic well-being of our fishermen; and

**WHEREAS,** our fishery, though small in scale, has been in existence since time immemorial, it is not just the economics of our fishery but a vital part of our history and without access to the salmon fishery we utilize we too can become history; and

**WHEREAS,** any prolonged closures, unreliable fishing schedules for us not only affects our fishermen and their families, they also affect our seafood processors due to lost markets, reduced productivity, idle plant employees, industry employees with eh existence of the communities we currently live in; and

**NOW THEREFORE BE IT RESOLVED,** that the **Unga Tribal Council strongly opposes Board of Fish Proposals 108, 109, 110, 111, 112, 116, 120, 126, 127, 129, 130, 131, 132, 133, 136, 140, 141, 143, 148, 152,** proposals that adversely affect our fishermen, our livelihood, and our communities we currently live in.

**CERTIFICATION:**

This resolution was duly considered and adopted at a meeting of the Unga Tribal Council (Native Village of Unga) in Sand Point, Alaska on January 23, 2025 at which a quorum of Council Members were in attendance. For 5, Against 0, Abstain 0, Present 5.

  
\_\_\_\_\_  
President, John Foster

**ATTEST:**

  
\_\_\_\_\_  
Secretary, Dwain foster 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:

My name is Richard Nelson. I am a fisherman, permit holder, relief captain, and crew member. I was born in Fairbanks, raised in Salcha, and have fished in Area M since 2010.

If the Board reduces time or area in Area M, it would impact my entire life. I have based my life around fishing in this area, and it is the sole source of income for my household. It would also severely impact the communities where I fish and spend most of my time.

Reducing fishing opportunity would negatively affect nearly every household and business in these communities. If our livelihood is taken away, the community will undoubtedly suffer and could disappear.

The current chum management system has already negatively impacted communities by taking fishing time away in Area M, while the true problems affecting chum and king salmon lie in river systems. I have personally witnessed cabins falling into salmon-bearing rivers, releasing fuel, oil, and chemicals known to harm salmon runs, without adequate response from regulatory agencies.

Salmon runs vary by river system, and 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.

Thank you for considering the impacts these decisions will have on fishermen and the communities we support.

Respectfully,

Richard Nelson  
Salcha & 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 Alvin Newman. I am a permit holder from King Cove and have lived here for 63 years.

Further reductions in Area M would result in loss of income for my business and crew wages. King Cove is already struggling without a processing plant, and any additional loss of income would further hurt the community.

Our school is losing students, and people are already moving away. Any more loss of income for crew members and families would be devastating for the community.

Area M has already reduced chum harvest through adaptive management. Runs vary by river system, and climate and habitat stressors cannot be regulated away. 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.

Respectfully,

Alvin Newman  
King Cove, Alaska



February 2, 2026

## Public Comment

Good morning/afternoon, board members.

My name is Drayton Newman I am from Sand Point, I was raised in King Cove; I have been a commercial fishermen for most of my life; and I am here in opposition of proposals :

126

127

128

129

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132

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143

Quiet frankly I oppose all these because fishing in June pays our bills, it gets us the funding we need to attempt to make a profit for the rest of the summer. To put this metaphorically, if this where a hurdled race, and you had each area represented as a runner, cutting off Area M's legs (our June fishery.) isn't going to ensure the other runners a win, they are still going to face the same hurdles they would if we were participating, All cutting off our legs, cutting off June is going to do, is ensure that we don't race, that we don't have the economic support that is necessary for the few communities we do have to survive...

Thank you for you time

Drayton .N.

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 raised in King Cove, and I live in Sand Point now and am trying to raise my family here. These proposals would affect my family's income, my neighbors, and my community members. As a result, basic economics cost of living would increase from lack of sales.

Employment is already difficult. Our city is making it by the little fish taxes that do come in. Already struggling sectors of the city will more than likely be cut, limiting services to the community, as well as increasing the cost of what can be offered, making living in the region questionable at best.

King Cove's cannery is a prime example of negative impact. Nobody with the power wants to buy into a dying industry. King Cove's projections for the "City of King Cove" are depressing at best. My father-in-law said it best: "They're trying to rob Peter to pay Paul."

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. 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,

Drayton Newman

[REDACTED]

Sand Point, AK

**Submitted by:** Dustin Newman

**Community of Residence:** Anchorage

Good Afternoon,

Dustin Newman from King Cove, AK. I am the grandson of the late Robert “Babe” Newman and Rudy Demoski Sr. I’m Unangax and Deg Hit’an Athabascan. I grew up in King Cove and now live in Anchorage. Looking through the proposals, I sympathize with our relatives along the Yukon Kuskokwim, I sympathize with my Unangax People along the Aleutian chain/ Alaska Peninsula. Both regions are threatened by the decline in fisheries whether it is commercial fishing or our traditional foods. No group of people holds the right answer to the questions of balancing our worlds, our ecosystems, our ways of life. No longer pointing fingers at who is wrong and who is right.

As people we must recognize our impact as a collective group. Recognizing that warming temperatures in the Bering Sea, along our coastal marshes influence our salmon runs. We must also recognize the impact our own people have on the ecosystem of the Bering Sea. On a Federal and State level we must face the reality that the system forced upon our people and regions is mismanaged and further harms the ability to have a true sustainable fishery for generations to come.

Unangax People have been caretakers of what is called Area M for thousands of years. We aren’t a salmon people, we are an ocean people, and we continue to steward these waters through effective management based in traditional knowledge from our Unangax fisherman. What is clouded by extractive colonialism is rooted in traditions based on our food systems.

Proposal 136 is not the answer to the issue of lower chum/ chinook salmon runs. It is simply a hypothesis, an experiment that will culturally and economically impact the people and families of the Eastern Aleutians. It will create further division among the regions, that will have greater impact on our ways of life as Alaska Native people. Together our tribal people should be meeting in the middle with our traditional knowledge and data to create systems that will benefit us all in fisheries management.

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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 fished since I was a kid, and it is what my dad and grandfathers have done.

These proposals would destroy our community. It has been getting harder to make a living here, and in my generation alone, more than half of my peers have had to leave to find better opportunities to make a living.

Our community is a fishing community. It affects everyone and everything. Without it, there will be less money for schools and businesses, and shutting down fishing will kill the community and eventually the city of King Cove. Everything my grandparents worked hard to build and pass down would be lost.

Losing the cannery has already affected how many people the city of King Cove can have on payroll and how it pays for city needs. It has affected our grocery stores and their ability to get food here. We now only get a boat once every two weeks, and two stores have closed down. Losing any fishing time or closing it down will make everyone's problems a lot worse and will lead to the end of the city of King Cove. Fishing is the primary source of income for most families living in our area. Without it, they are taking not just our jobs, but our ability to live in our home and on our precious land.

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

Jaimen Newman

  
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:

My name is Connie Newton. I was born and raised in King Cove. I am a longtime fisherwoman, local business owner, and I raised my four children in King Cove. All four of my children are part of the fishing industry.

We have already been struggling over the past four years with less-than-average fishing seasons. At the same time, grocery, fuel, and electric costs have continued to rise. All four of my children have had to take on additional jobs outside of King Cove throughout the year just to support themselves.

We have already lost families due to poor fishing seasons. Our schools have been greatly affected, with fewer students and less funding. The rising cost of groceries, fuel, and electricity has directly impacted my business. Instead of being open six days a week, I am now open three days a week, and sometimes only two.

Further restrictions on our fishery will not help declining stocks, but they will devastate our local community. Our seasons have already been shortened, and unpredictable weather makes fishing challenging for everyone. Additional restrictions would only make survival more difficult for fishermen, families, and small businesses.

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,

Connie Newton  
King Cove, 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 an Area M boat and permit holder and a lifelong community member of King Cove. I fish in Area M in the Alaska Peninsula and Aleutians East.

The impacts of these proposals would affect my income, my ability to stay in the community, and my livelihood.

They've been cutting our fishery for years without any proof. When is it going to be enough? Everyone in the community's main source of income is salmon fishing in Area M. The community is already suffocating after Peter Pan closed down in King Cove.

We have lost many lifelong local residents and their kids due to restrictions on salmon fishing, causing people to move to find work. People don't understand how much King Cove and Area M residents rely on the salmon season. It is very hard to make a living off any other season locally.

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.

WHERE'S THE PROOF? They can't keep pointing the finger and cutting our fishery down before knowing the facts. Investigate the other hundreds of reasons it may be. We are only one small area those fish migrate by, and we already don't get paid for dogs in June and stopped fishing outside three miles, on top of shallower nets and chum caps. It seems not to be affecting anything. Time to look other places and spend the money to research and find proof.

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,

Mark Newton

  
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 have family in Nelson Lagoon, Cold Bay, and throughout the Aleutians East Borough. The loss of revenue to the region from further restrictions on Area M fisheries would be devastating.

It would mean fighting to keep basic infrastructure functioning, and families would no longer be able to afford to remain in their home communities. Forced relocation and displacement have serious and lasting negative effects on families and communities.

Area M has already reduced chum harvest through adaptive management, and this effort has been successful. Salmon runs vary by river system, and climate and habitat stressors cannot be regulated away.

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

Respectfully,

Candace Nielsen  
Nelson Lagoon, Alaska



February 2, 2026

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 Robert Nyberg. I live in Sand Point. I am submitting my comments today in strong opposition to any proposals that would sharply reduce fishing time and opportunity in Area M.

I am a 50-year resident of Sand Point, Alaska. During these years I have been a commercial fisherman in Area M, as well as the maintenance director at the Sand Point School. My wife was a long-time educator in Sand Point, having taught both elementary and high school classes. She had the opportunity to teach three generations of kids in the community.

These proposals would be devastating not only to Sand Point, but to other communities in the East Aleutians as well. These communities are very expensive to live in, yet people have lived here for generations and want to remain in their ancestral homelands.

If accepted, these proposals will make life difficult to sustain due to the rising costs of housing, fuel, and food security. Without fishing proceeds and fish tax revenue, schools will be forced to eliminate programs that have existed for generations, including sports travel and other opportunities our children deserve.

Area M has already reduced chum harvest through adaptive management. Runs vary by river system, and climate and habitat stressors cannot be regulated away. 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.

Please consider these factors carefully when making your decisions.

Respectfully,

Robert Nyberg  
Sand Point, Alaska

[REDACTED]

**Submitted by:** Robert Nyberg

**Community of Residence:** SAND POINT

February 2, 2026

In response to Proposals 106-161

My name is Robert Nyberg. I live in Sand Point. I am submitting my comments today in strong opposition to any proposals that would sharply reduce fishing time and opportunity in Area M.

I am a 50-year resident of Sand Point, Alaska. During these years I have been a commercial fisherman in Area M, as well as a maintenance director at the Sand Point School. My wife was a long-time educator in Sand Point, having taught both elementary and high school classes. She had the opportunity to teach three generations of kids in the community.

These proposals would be devastating not only to Sand Point, but other communities in the East Aleutians as well. The communities are very expensive to live in, but people have lived here for generations and want to stay in their ancestral homelands.

If accepted, these proposals will make life difficult to sustain, due to the rising costs of housing, fuel and food security. Without the fishing proceeds substantially lower fish tax, the schools will have to eliminate programs that have been in place for generations, such as sports travel and other opportunities that they so well deserve.

Please consider these factors when making your decisions about the future of these communities.

Respectfully,

Robert Nyberg

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**Proposal 108 – Repeal Early Western/Perryville District Openings****Oppose Proposal 108**

I strongly oppose Proposal 108, which seeks to amend 5 AAC 15.375(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 5AAC 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 the harvest opportunities for Chignik fisherman without proven conservation benefits.

I've fished Chignik for 41 years. I rely on ADF&G's experienced management to balance sustainability with economic viability. 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 this proposal 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 5AAC 15.200(b) and 5AAC 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. Boats can already fish the area with smaller nets under existing rules, 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 fisherman in the same fishery and gear type (purse sein), as it would impose Chignik Bay Districts 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 Bord 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.

With 41 years of experience in the Chignik fishery, I was never contacted about this proposal despite the proposer's claim of coordination with fisherman. This lack of inclusive input undermines the BOFs emphasis on stakeholders' collaboration under AS 16.05.251, which requires consideration of historical use, allocation criteria and the best available information.

I recommend the BOF deny this proposal to preserve traditional districts and ensure decisions are based on comprehensive input.

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

#### **Support Proposal 110**

I support proposal 110 to amend 5 ACC 15.332(d)-(e) by reducing maximum purse seine depth from 375 to 325 meshes (including chafing gear) and clarifying that the aggregate seine plus lead length in the Chignik Bay district is limited to 125 Fathoms

I would like to see regulations that would also allow a 250-fathom net like the Kodiak area.

Harmonizing with Kodiaks gear specs 325 meshes deep, 250 fathoms long would standardize regulations across areas, easing enforcement burdens on ADF&G and reducing compliance issues for fisherman.

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

#### **Oppose Proposal 111**

I oppose Proposal 111, which aims to amend 5AAC 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 (5AAC 15.357) including mid-season closers of Mitrofanina Island portions to conserve Chinook and immature salmon. Adding new statistical areas would impose unnecessary regulatory layers, burdening both ADF&G and fisherman without clear benefits. This micromanagement opposes the BOF's preference for flexible, science-based methods (AS 16.05.251) and may 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 area risks unintended allocation shifts, potentially harming historical users.

I encourage the board to reject this to avoid over-regulating a system that works.

### **Proposal 112- Codify King Salmon Conservation Measure & Caps**

#### **Oppose Proposal 112**

I oppose Proposal 112, which seeks to amend 5ACC 15.357 with new chinook conservation measures, including area closures in Chignik Bay, time restrictions in Mitrofanina and harvest caps (1,000 Chinooks in 48 hours – 7 day closure; 5,000 total – closure through August 10).

While Chinook conservation is crucial-as a subsistence user, it's vital to my livelihood- ADF&G already has authority under 5ACC 15.357 and AS 16.05.060 to close areas like Chignik Lagoon for protection, as demonstrated successfully in past seasons. This proposal would micromanage ADF&G, limiting their flexibility to use best available data for adaptive decisions. Rigid caps and closures could unnecessarily restrict sockeye harvest, impacting local tribal fishermen with small boats who lack alternatives, contrary to subsistence priority (AS 16.05.258) and equitable allocation (AS 16.05.251 (e))

Developed partly by the Chignik Advisory Committee, it overlooks that emergency orders have worked without codifying such constraints. Let ADF&G do their job without added burdens.

I ask the board to deny this proposal in favor of maintaining current management tools.

Regards,

Garrett Olsen

**Submitted by:** Jeffrey Olsen

**Community of Residence:** Burien, WA

Jeffrey Olsen, Permit holder, fishing since 1975

Proposal 108 – Repeal Early Western/Perryville District Openings

Oppose Proposal 108

I strongly oppose Proposal 108, which seeks to amend 5 AAC 15.375(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 5AAC 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 the harvest opportunities for Chignik fisherman without proven conservation benefits.

I have been actively fishing in the CHIGNIK DISTRICT for 51 years. I rely on ADF&G's experienced management to balance sustainability with economic viability. 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 this proposal 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 5AAC 15.200(b) and 5AAC 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. Boats can already fish the area with smaller nets under existing rules, 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 fisherman in the same fishery and gear type (purse sein), as it would impose Chignik Bay Districts 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 Bord of Fisheries (BOF) criteria in AS 16.05.251 (e), including historical use, economic dependance, and equitable distribution among users— criteria this proposal does not adequately address, risking unfair impacts on historical participants without sufficient justification.

With 51 years of experience in the Chignik fishery, I was never contacted about this proposal despite the proposer's claim of coordination with fisherman. This lack of inclusive input undermines the BOFs emphasis on stakeholders' collaboration under AS 16.05.251, which requires consideration of historical use, allocation criteria and the best available information.

I recommend the BOF deny this proposal to preserve traditional districts and ensure decisions are based on comprehensive input.

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

### Proposal 110

I support proposal 110 to amend 5 ACC 15.332(d)-(e) by reducing maximum purse seine depth from 375 to 325 meshes (including chafing gear) and clarifying that the aggregate seine plus lead length in the Chignik Bay district is limited to 125 Fathoms.

I would like to see regulations that would also allow a 250-fathom net like the Kodiak area.

Harmonizing with Kodiaks gear specs 325 meshes deep, 250 fathoms long would standardize regulations across areas, easing enforcement burdens on ADF&G and reducing compliance issues for fisherman.

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

### Oppose Proposal 111

I oppose Proposal 111, which aims to amend 5AAC 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 (5AAC 15.357) including mid-season closers of Mitrofanina Island portions to conserve Chinook and immature salmon. Adding new statistical areas would impose unnecessary regulatory layers, burdening both ADF&G and fisherman without clear benefits. This micromanagement opposes the BOF's preference for flexible, science-based methods (AS 16.05.251) and may 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 area risks unintended allocation shifts, potentially harming historical users.

I encourage the board to reject this to avoid over- regulating a system that works.

## Proposal 112- Codify King Salmon Conservation Measure & Caps

### Oppose Proposal 112

I oppose Proposal 112, which seeks to amend 5ACC 15.357 with new chinook conservation measures, including area closures in Chignik Bay, time restrictions in Mitrofanina and harvest caps (1,000 Chinooks in 48 hours – 7 day closure; 5,000 total – closure through August 10. While Chinook conservation is crucial-as a subsistence user, its vital to my lively hood- ADF&G already has authority under 5ACC 15.357 and AS 16.05.060 to close areas like Chignik Lagoon for protection, as demonstrated successfully in past seasons. This proposal would micromanage ADF&G, limiting their flexibility to use best available data for adaptive decisions. Rigid caps and closures could unnecessarily restrict sockeye harvest, impacting local tribal fisherman with small boats who lack alternatives, contrary to subsistence priority (AS 16.05.258) and equitable allocation (AS 16.05.251 (e))

Developed partly by the Chignik Advisory Committee, it overlooks that emergency orders have worked without codifying such constraints. Let ADF&G do their job without added burdens.

I ask the board to deny this proposal in favor of maintaining current management tools.

Regards,

Jeffrey H Olsen

---

**Submitted by:** Knud Olsen

**Community of Residence:** Marysville, WA

Knud H Olsen, Permit Holder since 1963.

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Oppose Proposal 108

I strongly oppose Proposal 108, which seeks to amend 5 AAC 15.375(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.

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I have been actively fishing in the CHIGNIK DISTRICT for 67 years. I have been an active permit holder since 1963. I rely on ADF&G's experienced management to balance sustainability with economic viability. 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.

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Moreover, this change may cross into allocative issues between fisherman in the same fishery and gear type (purse sein), as it would impose Chignik Bay Districts 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 Bord of Fisheries (BOF) criteria in AS 16.05.251 (e), including historical use, economic dependance, and equitable distribution among users— criteria this proposal does not adequately address, risking unfair impacts on historical participants without sufficient justification.

With 67 years of experience in the Chignik fishery, I was never contacted about this proposal despite the proposer's claim of coordination with fisherman. This lack of inclusive input undermines the BOFs emphasis on stakeholders' collaboration under AS 16.05.251, which requires consideration of historical use, allocation criteria and the best available information.

I recommend the BOF deny this proposal to preserve traditional districts and ensure decisions are based on comprehensive input.

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I encourage the board to reject this to avoid over- regulating a system that works.

Proposal 112- Codify King Salmon Conservation Measure & Caps

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Developed partly by the Chignik Advisory Committee, it overlooks that emergency orders have worked without codifying such constraints. Let ADF&G do their job without added burdens.

I ask the board to deny this proposal in favor of maintaining current management tools.

Regards,

Knud H Olsen

## Testimony to Board of Fish February 2026

Madam Chair and members of the Board, my name is Alvin Osterback, I am Aleut, I live in Sand Point as many generations have before me, I am a lifelong fisherman. I am also the Mayor of the Aleutians East Borough which includes all six communities which reside in the boundaries of Area M.

The people of our area have been fishing for thousands of years; we are Aleut and considered to be the first settlers of Alaska. We have fished salmon for many generations before others arrived and settled the Southwest portion of this land when it came out of the ice age.

I would like to talk about the Aleutians East Borough, we formed in 1987 when the state of Alaska pushed for all areas of the state to form boroughs to help strengthen portions of the state and help growth and development.

Upon formation of the Aleutians East Borough, we immediately took ownership of the schools in each of our communities as required by the state of Alaska. This alone was a large burden removed from each local government, without each community having to payout a portion of their tax revenue to operate the school system, they had more options for money saved to improve other services in their communities.

The Aleutians East Borough has a 2% raw fish tax that is used to operate the borough and provide services to each of our 6 communities.

Over time we grew in our responsibilities to include infrastructure such as building boat harbors and docks for our fishing fleets. We also built airport runways, terminal buildings, roads, invested in medical clinics, built new schools and rebuilt existing school structures.

All of this is accomplished using the 2% raw fish tax and federal and state match dollars. We have bonds that accompany most of our projects. The federal and state governments approved these bonds because we have a stable tax base that they felt warranted the loaning of revenues.

I am only going to comment on Proposal 132 and the reason is this one caught my eye. I look at the large responsibility the Aleutians East Borough has towards maintaining its fiscal responsibilities and providing services to each of its communities knowing when we come up on the Board of Fish cycle we need to be vigilant of misinformation that could cause board action that may reduce our ability to meet our financial obligations.

Proposal 132 states we use nets 2000 meters in length, that equates to 1093.5 fathoms.

By regulation an Area M seine can be 250 fathoms in length.

Proposal 132 also states that the depth is 200 meters which equates to 109 fathoms, in fact the regulation states depth of seine is 375 meshes of 3.5 inch mesh, if this is stretched totally would be about 18 fathoms, so hung and fishing roughly 12 fathoms as there is also a 25 mesh chafing strip allowed on the lead line of 7 inch mesh.

We are also allowed to use leads which are up to 150 fathoms.

Proposal 132 also talks about the number of permits in Area M, so for the record in 2025, 49 purse seine permits fished out of 117 available or 52% fished. 117 drift net permits fished out of 161 available or 88% fished and 52 set net permits fished out of 111 available or 69%.

Total Area M permits fished in 2025 58% of available.

Another misleading issue is the size of the seiners it is correct in tonnage of vessels increasing from the 1960's, but the increase in tonnage started around 1980 as the fishermen started to adapt to fishing other species such as King Crab, cod and pollack. These were necessary upgrades to provide a stable platform for safely harvesting of stocks.

We also used much deeper seines, but as times changed and the fear that we were catching too many chums the nets got a lot more restricted in depth. And I have to say we have endured more time and area restrictions than I can count on our salmon fishery without real evidence of being responsible for the decline in AYK salmon populations.

As I have witnessed over the past 40 years there will be plenty of testimony pro and against each proposal, so I ask that each one be vetted properly and misinformation such as in Proposal 132 be called out and this type of misinformation be stopped before the proposal book is in print.

Thank you for your time.

Alvin Osterback  
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 am most connected to Area M. I have been fishing in this area for eight years, and my family has fished here their whole lives.

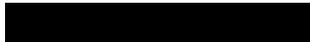
If the Board reduces time, area, or opportunity in Area M fisheries, it would mean many community members would lose their source of income, have no way to pay bills, and struggle to keep our towns running. The negative impacts would be felt immediately across schools, utilities, local services, businesses, and year-round jobs, because this fishery is a major source of income for our communities.

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.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Deven Osterback  
Sand Point, Alaska





February 2, 2026

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

RE: **Oppose** Proposals 108 – 112, 116, 120, 126, 127, 129 – 133, 136, 140, 141, 143, 147, 148, and 152  
 RE: **Support** Proposals 135, 142, 144, 145

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Alaska Peninsula/Aleutian Island/Chignik Finfish meeting scheduled for February 18 - 24. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including those that serve fleets in the Chignik, Bristol Bay, and Alaska Peninsula salmon fisheries. **PSPA is opposed to proposals before the Board which seek to impose additional restrictions on the South Alaska Peninsula June commercial salmon fisheries.** PSPA is aligned with the Eastern Aleutians Fisheries Coalition opposition to proposals 108 – 112, 116, 120, 126, 127, 129 – 133, 136, 140, 141, 143, 147, 148, and 152. We support Proposals, 135, 142, 144, and 145.

**The ADFG staff comments are very clear that the changes made by the Board in 2023, “when combined with fishing industry-lead efforts to reduce CWAK chum salmon intercept, have been effective in reducing CWAK chum salmon harvest in the June fishery.”** Many of these new proposals request further reductions to the fishing periods in the South Unimak and Shumigan Islands June fishery and are shown to have a significant negative impact on Area M fishermen, processors, Tribes, and the communities dependent on these fisheries. The Aleutians East Borough (AEB) is comprised of about 3,600 residents, living in Sand Point, King Cove, Nelson Lagoon, False Pass, Akutan, and Cold Bay (2024 Census Estimate). Commercial fishing and processing account for over 70% of all private-sector employment in AEB communities and approximately 70% of the Area M permits are held or fished by Alaska residents, many of whom live in AEB communities. Fisheries-related revenue comprises the majority of these communities’ general funds, supporting schools, transportation, utilities, public safety, and other local government operations.

In short, the ability to have a local economy in this region and to continue operating processing plants is directly related to dependable access to salmon fisheries. Additional reductions in sockeye fishing opportunity on top of what has already been restricted by the Board in recent years is akin to ‘death by a thousand cuts’ for this region, and most importantly, ineffective for conservation of Chinook or reduction of chum salmon harvest.

In the last several years, there has been significant change and uncertainty in the processing sector which provides critical markets for these rural coastal fishermen and fishing businesses. The communities of King Cove, Chignik, and Port Moller no longer have operating processing facilities, which represents a reduction of half of the operating facilities in this region. The remaining processors in False Pass and Sand Point have been focused on stability, through partnering with other regional community organizations and tendering, to try to protect and maintain fishing opportunities for all fleets (salmon,

cod, etc) in the region. Reductions in access to sustainably managed fisheries have had an impact here before, and they are having an impact now. Please consider that any unwarranted or ineffective restrictions on these communities so fully dependent on commercial salmon fisheries is going to compound the harm these communities are already experiencing.

**Results of Previous Board Action**

The Area M fleet and processors have worked hard since 2022 to significantly reduce chum harvest by using voluntary time and area closures and stand-downs implemented on the water in response to chum abundance throughout the June season. This reduced chum harvest in 2022 by 50% compared to 2021. The Board took action in 2023 to further reduce fishing hours and area (Sanak), but the core of the improvements continued to be due to the in-season strategy imposed by the fleet. These reduced harvest levels have been maintained consistently, demonstrating that the reductions are durable and not a one-year anomaly. **Chum harvest in 2025 was down 65% from 2024 and down 67% from the past five- and ten-year average harvests.**

In 2023, the board made numerous changes to the South Unimak and Shumagin Islands June Salmon Management Plan to conserve CWAK chum salmon. These changes, when combined with fishing industry-lead efforts to reduce CWAK chum salmon intercept, have been effective in reducing CWAK chum salmon harvest in the June fishery. The department believes the current management plan and industry-lead conservation efforts are effective tools to conserve CWAK chum salmon while providing harvest opportunity on salmon stocks with identified harvestable surplus. Prolonged or extensive closures that significantly reduce available fishing time can discourage the fleet from adopting proactive, industry-led measures, such as test fishing to assess chum salmon abundance or implementing voluntary closures in high-abundance chum salmon areas.

In sum, since the Area M seiners’ adaptive management program began in 2022, the ADFG genetic report shows 17.5% to 26.6% of the June harvest is comprised of chum from the Coastal Western Alaska (CWAK) aggregate stock grouping, meaning the average annual June CWAK chum harvest since 2022 has been about 78,000 fish (bound for rivers from Norton Sound to Bristol Bay). **Please see Figure 14 from the Area M Seiner’s Association comment letter that shows estimated harvest rates of between 2.3% and 5.9%:**

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

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

The fleet is committed to this inseason approach, which is the only way to respond quickly to chum conditions in real-time, and the fleet has strengthened the program to create greater responsiveness

and accountability as directed by the Board. In practice this means moving quickly to avoid chum when chum rates increase, faster and more accurate information-sharing across the fleet through a formal database (portal) in which the entire fleet participates, and accountability for each individual vessel. This type of adaptive management requires vessels to share catch data and location, processors to provide daily reports in near real-time, and vessels to move or stop fishing when directed to do so. Retaining this adaptive management framework is critical to further improvement. This innovative program was endorsed by the 2023 Board and is a testament to Area M fishermen's commitment to conservation.

**The Board's previous action in 2023, along with the chum avoidance program implemented by the fleet and overseen by ADFG, already results in significantly less fishing time:**

- Since the program was formalized in 2023, the seine fleet has collectively stood down an average of 291 hours of fishing time per year, across multiple closure types, areas, and periods, as part of the adaptive management framework.
- In 2025, as a result of the adaptive management program, the drift fleet collectively stood down 554 hours of fishing time across 28 vessels and 64 separate stand-down events, reflecting broad fleet participation over and above the regulatory requirements.
- Both the seine and drift fleets have voluntarily foregone the first fishing day of the June season every year since 2022, recognizing higher early-season risk and choosing to reduce impacts proactively.
- The seine fleet has also voluntarily conducted a pre-season test fishery prior to the start of June, often at its own expense, to assess chum presence before directed sockeye fishing begins.

The ADFG staff comments on several of the proposals we oppose are very specific on the significant level of additional reductions in fishing time proposed on top of current restrictions. Adoption of proposal 127, for example, would reduce commercial fishing periods for purse seine gear between 132 and 154 hours. Drift gillnet gear fishing periods would be reduced by 176 hours. This results in foregone harvest by purse seine gear and drift gear by more than 415,000 and 215,000 sockeye salmon, respectively. **And while the ADFG staff comments are neutral on allocative proposals, they are very clear on the benefits of the current management system and the risk of further restrictions not just to the sockeye fishery but to the success of CWAK chum avoidance:** "The department believes the current management plan and industry-lead conservation efforts are effective tools to conserve CWAK chum salmon while providing harvest opportunity on salmon stocks with identified harvestable surplus. Prolonged or extensive closures that significantly reduce available fishing time can discourage the fleet from adopting proactive, industry-led measures, such as test fishing to assess chum salmon abundance or implementing voluntary closures in high-abundance chum salmon areas." (p. 89)

The proposals we explicitly support provide ADFG with additional EO authority. They would allow the department to require non-retention of king salmon as determined necessary (Proposal 135); allow the department to open individual (or multiple) fisheries at different times in August as opposed to opening all gear types concurrently (Proposals 142 and 145); and would allow the department to open the setnet fishery in August to test run strength before maximum escapement goals are met (Proposal 144).

Area M fishermen, processors, and the Aleutians East Borough have invested significant time and funding into developing an on-the-water program that has proven to reduce chum harvest while targeting sockeye salmon that is critically important to these communities and the State. Please continue to support the most effective system we have to balance these objectives.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Decker". The signature is fluid and cursive, with the first name "Julie" being more prominent than the last name "Decker".

Julie Decker  
PSPA, Wrangell

Submitted by: Tony Parra

Community of Residence: South Dakota

Madam Chair and Members of the Board,

I have been an Area M fisherman since 1995 and an Area M drift gillnet boat/permit owner for the last 10 years. In addition, I have worked as a professional fishery biologist for over 20 years, with experience in salmon population watershed assessments throughout the Pacific Northwest region. Thank you for your consideration of my positions on Alaska Peninsula, Aleutian Islands, and Chignik regulation proposals as follows:

**Proposal 106: Support.** Subsistence harvesters should have as much opportunity to fish as the resilience of the stocks they fish for allows.

**Proposal 107: Support.** Fish taken under a personal use permit should not be sold.

**Proposals 108-112: Oppose.** There is no science-based evidence that AYK chum or chinook occur in the Perryville or Western Districts of the CMA, or that the proposed regulations would have any effect on these or other chinook stocks.

**Proposal 113: Support.** Nelson River sockeye over-escapement is deleterious to the stability and conservation of the stock. Allowing a drift and set net fishery by emergency order in Caribou Flats provides a means of controlling over escapement of Nelson River sockeye, as well as providing a commercial fishery and state cost-recovery resource.

**Proposal 114: Support.** Rolling closures for Ilnik, Three Hills, and Bear River sections sunsetted in 2018. Language referring to said rolling closures is obsolete and should be eliminated.

**Proposal 115: Support.** Provides management flexibility to open or close Ilnik north and south portions based on escapement of North Peninsula stocks besides other than only Ilnik salmon.

**Proposal 116: Oppose.** Outer Port Heiden section is too small and too distant from Nelson Lagoon to have a measurable effect on Nelson River escapement. Current Outer Port Heiden regulations provide ample time windows for non-Meshik stocks to transit the area.

**Proposals 117 & 118: Oppose.** Steelhead catch in the North Peninsula drift fishery is virtually non-existent.

**Proposal 119: Support.** Set netting has a minimal influence on Chignik stocks yet is vital to this segment of Area M fisheries. Set netters need enough opportunity to survive.

**Proposal 120: Oppose.** Reducing the SEDM seine fishery should be based on emergency order and run size/stock composition, not by statutory regulation.

**Proposal 121-125: Support.** The SEDM seine fishery should have ample opportunity to fish based on run size and stock composition. By the time Chignik escapement and harvest quotas are met, it is too late for SEDM seiners to catch their allocation of the run.

**Proposals 126: Oppose.** Southwestern and South Central District seine fisheries should be managed by actual run strength and stock composition, not by statutory regulation.

**Proposal 127-133: Oppose.** I am categorically opposed to proposals 127-133, which seek to further reduce the June South Peninsula fishery. Every study from WASSIP to the current mixed-stock monitoring efforts show that the **HARVEST RATE of Arctic/Yukon/Kuskokwim (AYK) Chum stocks by the June South Peninsula fishery is INSIGNIFICANT** (i.e. less than or equal to 5% of the AYK run), and often statistically undetectable, which contradicts the assertions made by the authors of these proposals.

Meanwhile, the authors of proposals 127-133 have and continue to benefit financially from the Bering Sea Trawl Fishery. This trawl fisheries exacts a greater toll on AYK Chum and Chinook stocks than does the June South Peninsula salmon fishery. **Proposals 127-133 are a thinly veiled attempt to deflect attention from their own deleterious activities and constitute a conflict of interest on the part of the authors and their proponents.** If the authors of these proposals were sincere in their intention to conserve and recover Western Alaska salmon stocks, they would have included language in their proposals to reduce their trawl fishery salmon bycatch quotas commensurate to the levels which they are requesting you to reduce ours.

Moreover, consensus among the scientific community attributes the decline of AYK chum stocks primarily to climatic and anthropogenic impacts. To address the significant (70+%) decline of AYK chum stocks by addressing an insignificant (+/-5%) factor affecting said stocks abdicates Alaska state responsibility to mitigate for the significant factors that directly affect chum survival in the AYK region. Factors such as flow level, water temperature, habitat degradation, and productivity are identified and mitigated in every other major salmonid watershed throughout the Northeast Pacific. **The AYK salmon stocks will continue to decline unless the significant direct effects of said decline are addressed and mitigated for directly** by efforts including habitat enhancement, water quality improvement, trap/transporting of salmon around unsuitable habitats, and hatchery supplementation.

**Proposal 134: Support.** The June South Peninsula salmon fishery has a low (5%) harvest rate on AYK chum. Implementing adaptive management in conjunction with the current mixed stock genetics monitoring program provides data driven, real time adjustments that conserve stocks of concern.

**Proposal 135: Support.** Seine caught salmon stand a much better chance of survival after release than with other gear types.

**Proposal 136: Oppose.** AYK subsistence fishers, families, and communities have my sympathy for not being allowed to harvest in recent years. This proposal to eliminate the June South Peninsula fishery, however, will not improve matters for AYK stocks. As previously stated, the June South Peninsula harvest of AYK stocks of concern is insignificant. One simply can not hope to effect significant improvement by addressing an insignificant factor affecting these stocks.

**Proposals 137-139: Support.** The setnetters of Area M exact a minimal toll on the stocks they fish for. Provide enough fishing opportunities for the setnet fleet so that they might survive.

**Proposal 140-141: Oppose.** There is no evidence to support the positions that reductions of the South Peninsula fishery will have any effect on non-local chinook or sockeye stocks.

**Proposal 142: Support.** Allowing gear-type specific emergency order openings on the South Peninsula fishery provides resource managers the ability to fine tune the fishery according to run strength and their spatial/temporal distributions on the grounds.

**Proposal 143: Oppose.** The setnet fishery catches few, if any, juvenile or chinook salmon. Why close a fishery that has no adverse effect on the resource?

**Proposal 144: Support.** The setnetters of Area M exact a minimal toll on the stocks they fish for. Provide enough fishing opportunities for the setnet fleet so that they might survive.

**Proposal 145: Support.** Allowing gear-type specific emergency order openings on the South Peninsula fishery provides resource managers the ability to fine tune the fishery according to run strength and their spatial/temporal distributions on the grounds.

**Proposal 146: Support.** The setnetters of Area M exact a minimal toll on the stocks they fish for. Provide enough fishing opportunities for the setnet fleet so that they might survive.

**Proposal 147: Oppose.** The depth at which salmon migrate depends on many factors besides species: turbidity, ambient daylight, prey base, and tidal cycle to name a few. The current 90 mesh South Peninsula drift net regulation provides ample reduction in catch rate efficiency for deepwater migratory stocks in real-world conditions.

**Proposal 148: Oppose.** The depth at which salmon migrate depends on many factors besides species: turbidity, ambient daylight, prey base, and tidal cycle to name a few. The current 375 mesh South Peninsula seine regulation provides ample reduction in catch rate efficiency for deepwater migratory stocks in real-world conditions, and purse seine length in Area M occurs in a much wider geographic area than the rationale of complying with Chignik, Kodiak, Cook Inlet, and Prince William Sound seine fisheries.

**Proposal 149: Support.** The setnetters of Area M exact a minimal toll on the stocks they fish for. Provide enough fishing opportunities for the setnet fleet so that they might survive. Extending

the length regulation of a setnet will have minimal effect on other gear types and stocks of concern.

**Proposal 150: Support.** Debris load of setnets in Area M has increased dramatically. Monofilament web is much more resistant to debris load and can be cleaned effectively.

**Proposal 151: Oppose.** Regulatory reductions in setnet gear are not warranted, as this gear type exerts a minimal influence on any given salmon stock.

**Proposal 152: Oppose.** There is no evidence to suggest that reducing seine depth and lead line length will have any effect on reducing catch of salmon stocks of concern. The depth at which salmon migrate depends on many factors besides species: turbidity, ambient daylight, prey base, and tidal cycle to name a few. The current 375 mesh South Peninsula seine regulation provides ample reduction in catch rate efficiency for deepwater migratory stocks in real-world conditions.

**Proposal 153: Support.** Debris load of setnets in Area M has increased dramatically. Monofilament web is much more resistant to debris load and can be cleaned effectively.

**Proposal 154: Support.** Establishing a summer herring fishery in South Peninsula Districts would diversify fishery opportunities for local communities.

**Proposals 155-161: Support.** Conservation measures for king salmon on North Peninsula rivers are warranted due to declining escapement.

## Pauloff Harbor Tribe

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P.O. Box 97  
Sand Point, AK 99661

Phone: (907)383-6075  
Fax: (907)383-6094

### **Written Testimony Opposing Proposal 136**

South Unimak and Shumagin Islands June Salmon Management Plan

Submitted by: Pauloff Harbor Tribe

Meeting: Alaska Board of Fisheries 2026

Proposal: 136

The Pauloff Harbor Tribe respectfully submits this written testimony in opposition to Proposal 136, which would close the South Unimak and Shumagin Islands commercial salmon fishery from June 7 through June 28.

The Tribe acknowledges and respects the serious hardships being experienced by Yukon and Kuskokwim River communities due to prolonged salmon shortages. Salmon are foundational to Alaska Native cultures, food security, and traditional way of life across the state, and these impacts are deeply felt by all Tribal peoples.

However, Pauloff Harbor Tribe does not believe Proposal 136 represents a fair, effective, or data-supported conservation measure.

Alaska Department of Fish and Game (ADF&G) materials prepared for the Board, including January 29, 2024, overview and Attachment 4: table of South Alaska Peninsula June Harvest Compared to Yukon and Kuskokwim Salmon Runs, demonstrate temporal overlap between the South Alaska Peninsula June Fishery and AYK salmon migrations. While this overlap is acknowledged, the information provided does not establish stock-specific exploitation rates or demonstrate that the June Area M fishery is the primary driver of AYK salmon declines.

The ADF&G record also shows that management of the South Alaska Peninsula fishery has already undergone significant changes in recent years. These include reduced June fishing time, fishing windows, chum harvest triggers, Sanak Island closures, and additional time and area restrictions intended to improve chum passage. These measures reflect adaptive

management actions that are relatively recent and have not yet been fully evaluated for effectiveness.

Proposal 136 bypasses this adaptive management framework without demonstrating that existing measures are insufficient or that the proposed closure would produce measurable conservation benefits for AYK salmon stocks.

The Pauloff Harbor Tribe is also concerned about the precedent set by imposing disproportionate restrictions on a single region in response to system-wide salmon declines. AYK salmon challenges are widely understood to be influenced by multiple factors, including marine survival variability, climate change, freshwater habitat conditions, and cumulative impacts across numerous fisheries and regions. Addressing these challenges requires coordinated, system-wide solutions rather than region-specific closures absent proportional responsibility.

A full three-week June closure would impose substantial economic and safety impacts on fishing families and communities in the South Alaska Peninsula while offering no certainty that AYK rebuilding objectives would be achieved.

For these reasons, the Pauloff Harbor Tribe respectfully urges the Board of Fisheries to oppose Proposal 136 and continue pursuing data-driven, balanced conservation strategies that rely on adoptive management, improve stock composition analysis, and coordinated statewide approaches.

Under the current South Alaska Peninsula Management plan, the June commercial season already operates from June 7 through June 28. As written, Proposal 136 would close the fishery for this entire period, eliminating the June commercial fishing season in the South Unimak and Shumagin Islands.

**References**

Alaska Department of Fish and Game (ADF&G) January 29, 2024. Overview for the Alaska Board of Fisheries. ADF&G Attachment 4. Table of South Alaska Peninsula June Harvest Compared to Yukon and Kuskokwim Salmon Runs.



George P. Gundersen

President

Considered and adopted at a meeting of the Pauloff Harbor Tribal Council in Sand Point, Alaska on January 30, 2026, at which a quorum of the Council was in attendance.

For   5  

Against   0  

Abstain   0  

Present   5  

Absent   0

- 11 of 12 South Alaska Peninsula (SP) June Harvest compared to Yukon and Kuskokwim salmon runs.
- 1984-1986 fishing time limited to 96 hours per week and no more than 72 consecutive hours to allow "escapement windows."
  - 1986-2001 Bristol Bay GHLs and chum salmon caps. Caps ranged from 350,000 chum salmon to 900,000 chum salmon with a variety of methods to calculate cap from hard caps, % of sockeye harvest, to "floating cap."
  - 2001-2003 management plan identical to Proposal 140.
  - 2004-2022 set fishing periods or fishing "windows" established. Various changes to windows over previous BOF cycles. 2016 establishment of "Dolgoi Island" area to manage for Chignik-bound sockeye salmon. 2022 Record Copy (RC) 104 implemented a 50% reduction for purse seine gear.
  - 2023 Reduced commercial salmon fishing time with purse seine gear in June by 13% to allow chum salmon passage north; closed a known area of higher chum salmon abundance (Sanak Islands) to commercial fishing for salmon during June; created chum salmon harvest triggers that restrict and potentially close the commercial salmon fishery with purse seine gear in June, if met or exceeded; expressed an expectation, and received commitment from the fishing industry, that the industry coordinate efforts to reduce chum salmon harvest (this is incentivized by the triggers previously mentioned).

Year	All stocks	CWAK Stocks				Notes
	South Peninsula June Harvest	Bristol Bay	Kuskokwim	Yukon Summer Chum	Norton Sound	
		Total Run	Kogruluk River Weir	Total Run	Kwintuk River Tower	
1985	443,829	1,314,258	14,522	4,609,200	21,246	Bristol Bay GHLs; 96 hr per wk time limit
1986	351,769	1,430,945	12,880	4,507,600	35,034	Bristol Bay GHLs; chum salmon caps
1987	443,019	1,704,693	N/a	1,961,100	24,772	Bristol Bay GHLs; chum salmon caps
1988	526,711	1,687,487	29,426	4,488,900	22,596	Bristol Bay GHLs; chum salmon caps
1989	455,163	1,720,264	N/a	3,766,500	15,363	Bristol Bay GHLs; chum salmon caps
1990	518,545	1,428,535	26,556	1,905,200	15,819	Bristol Bay GHLs; chum salmon caps
1991	772,705	1,639,935	22,999	2,649,400	20,203	Bristol Bay GHLs; chum salmon caps
1992	426,203	1,303,927	36,085	2,809,600	12,080	Bristol Bay GHLs; chum salmon caps
1993	532,247	1,110,660	30,021	1,852,500	15,908	Bristol Bay GHLs; chum salmon caps
1994	582,165	1,362,962	N/a	3,798,300	33,219	Bristol Bay GHLs; chum salmon caps
1995	537,433	1,246,312	32,466	4,280,000	43,086	Bristol Bay GHLs; chum salmon caps

1996	359,820	1,106,037	48,225	4,404,800	28,493	Bristol Bay GHLs; chum salmon caps
1997	322,325	393,640	7,957	1,647,700	21,461	Bristol Bay GHLs; chum salmon caps
1998	245,619	765,235	N/a	1,007,900	25,403	Bristol Bay GHLs; chum salmon caps
1999	245,306	981,737	14,140	1,139,400	8,763	Bristol Bay GHLs; chum salmon caps
2000	239,357	571,689	11,426	550,480	13,147	Bristol Bay GHLs; chum salmon caps
2001	48,350	1,478,933	31,481	539,650	16,938	SP Strike/Prop 140 SP Management
2002	378,817	977,377	52,912	1,268,700	37,995	Prop 140 SP Management
2003	282,438	1,308,206	23,708	1,260,700	12,123	Prop 140 SP Management
2004	482,310	1,039,719	24,429	1,463,000	10,362	Fishing "windows"
2005	427,830	1,966,120	194,896	2,761,800	12,083	Fishing "windows"
2006	299,827	2,904,661	183,743	4,020,100	39,519	Fishing "windows"
2007	297,539	2,101,197	53,064	2,156,600	30,040	Fishing "windows"
2008	410,932	1,586,061	44,717	2,066,900	10,100	Fishing "windows"
2009	696,775	1,763,731	81,829	1,703,200	9,038	Fishing "windows"
2010	271,700	1,275,137	63,612	1,667,900	83,129	Fishing "windows"
2011	423,335	950,664	76,649	2,406,500	44,005	Fishing "windows"
2012	395,060	1,074,625	N/a	2,480,000	6,708	Fishing "windows"
2013	399,058	1,766,367	65,648	3,349,600	6,342	Fishing "windows"
2014	390,139	1,008,369	30,897	2,466,600	48,537	Fishing "windows"
2015	378,715	1,384,960	33,091	1,977,500	57,667	Fishing "windows"
2016	270,614	1,389,294	45,234	2,580,700	11,840	Fishing "windows," Dolgoi Island established
2017	640,891	1,910,166	85,793	3,634,400	38,441	Fishing "windows"
2018	537,466	2,372,855	52,937	2,074,200	59,077	Fishing "windows"
2019	549,072	1,909,175	71,006	1,686,400	24,356	Fishing "windows"
2020	490,123	405,435	19,020	763,280	5,382	Fishing "windows"
2021	1,168,601	328,597	4,153	355,630	4,189	Fishing "windows"
2022	544,097	421,340	13,471	478,130	12,142	Fishing "windows," RC 104
2023	205,522	453,284	11,780	845,988	3,600	Reduced fishing time; Sanak Island closure; harvest triggers; industry commitment

## Pauloff Harbor Tribe

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P.O. Box 97  
Sand Point, AK 99661

Phone: (907)383-6075  
Fax: (907)383-6094

### Written Testimony Opposing Proposals

We respectfully **oppose Proposals 108, 109, 110, 111, 112, 120, 126, 127, 128, 129, 130, 131, 132, 133, 140, 141, 143, 148, and 152**, which propose significant and permanent regulatory changes affecting the Chignik area and the Alaska Peninsula commercial salmon fisheries.

While we recognize the importance of conservation and the need to protect weak stocks where biologically demonstrated, these proposals rely on **piecemeal changes to time and area, district and section structure, statistical areas, test-fishery triggers, and gear specifications** rather than an integrated, region-wide approach. Any of these proposals would substantially alter management plans and operational frameworks without a comprehensive analysis of cumulative biological effectiveness, enforceability, or socioeconomic consequences.

If adopted, these proposals could have a **devastating and long-lasting impact** undermining economic viability, subsistence needs, and the cultural connection our people maintain with the fishery.

The impacts of reduced opportunity, increased regulatory complexity, and the displacement of fishing effort threaten not only individual permit holders, but the broader community infrastructure that depends on commercial fishing activity, including processors, support services, and intergenerational participation in the fishery. These proposals risk destabilizing local fishing operations, support services, and tribal economies without demonstrated biological benefit sufficient to justify such widespread harm.

We encourage the Board to maintain regulatory stability and direct the Alaska Department of Fish and Game to address conservation and interception concerns through improved data collection, transparent reporting, and targeted in-season management actions, rather than adopting multiple permanent plan rewrites and gear/time/area changes without full region-wide evaluation.

George P. Gundersen  
President

Considered and adopted at a meeting of the Pauloff Harbor Tribal Council in Sand Point, Alaska on January 30, 2026, at which a quorum of the Council was in attendance.

For   5  

Against   0  

Abstain   0  

Present   5  

Absent   0

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 lifelong resident of Sand Point.

Last June was the second-worst season I can remember. The only one worse was when we struck on price disputes and never fished at all in June. We need to be able to fish as much as we can and are doing all we can to avoid chums and kings. It makes absolutely no sense to make another few communities dependent on the welfare state.

People are already moving away. Schools are losing students. You need to let us be able to work.

Area M has already reduced chum harvest through adaptive management. This effort has been successful. Further restrictions would hit small rural coastal communities hardest. Climate and habitat stressors are major drivers of declines and cannot 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,

Dale Pedersen

[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 Dean Pedersen. I am a lifelong fisherman and permit holder from Sand Point, Alaska.

Any reduction in fishing time in Area M will directly affect my income, my business, and all of my crew members. I am still paying for my boat, and further reductions in fishing opportunity could have a drastic effect on my ability to make payments and properly maintain my vessel.

It is already extremely expensive to live in rural Alaska. Additional reductions would have a very negative impact on our community and make it even harder for fishermen and crew members to afford housing, utilities, food, and other basic necessities.

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 cannot be regulated away. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines, and further restrictions would hit small rural coastal communities hardest.

Please consider the financial realities facing fishermen and their crews when evaluating these proposals.

Respectfully,

Dean Pedersen  
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:

The cost of living in Sand Point is already extremely high, and people are working physically demanding jobs year-round just to get by. If Area M fisheries were further impacted, we would feel the effects for many years.

Fishing is the heart of this region. Any negative impact to the fisheries would harm our restaurants, schools, and year-round employment. I have seen how Area M fishermen have taken initiative, stayed connected, and advocated for responsible management to protect our home.

The past few years have been stressful and uncertain for local fishermen, including my own family. Despite this, people continue to adapt and push forward because this region is worth protecting.

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,

Grace Pedersen  
Sand Point, Alaska





February, 3rd 2026

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

RE: Opposition to proposals 127, 129-33 and 136 and Support for Proposals 134 and 135

Dear Chair Carlson-Van Dort,

Petersburg Vessel Owners Association (PVOA) is a mixed gear fleet of vessels that operate in State and Federal fisheries in Alaska and along the West Coast. PVOA's members participate in fisheries of all gear types throughout the State of Alaska, including the Alaska Peninsula, and rely on the sound management of fisheries resources to ensure the viability of their businesses and Petersburg as a community. PVOA has taken position on the following proposals for the February 18-24th Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting.

### **Proposals 127, 129-133 and 136**

PVOA opposes proposals 127, 129-133 and 136. This suite of proposals look to further limit or close the June fishery in Area M through time, area and harvest cap restrictions. The Area M fleet has demonstrated the effectiveness of their in season adaptive management measures, allowing them to fish much more prescriptively based on chum salmon abundance in the years since its development. Through the fleet's adaptive management framework, test fishing, and voluntary stand downs, the fleet has reduced their fishing time annually to ensure they decrease their harvest of chums. Through the adoption of these management measures, the fleet has been able to see a 50% reduction in their chum harvest in the June fishery.

Creating more static time and area closures runs counter to the current dynamic framework that has been shown to work. We cannot control exactly what time and day the chum salmon swim through the Area M fishery and by creating more restrictive and rigid opening and closure dates, the fleet will likely have less time on the water to avoid chum and harvest sockeye. This could lead to fishermen working in smaller harvest windows and still have pulses of chum move through the fishery during those periods, causing the fleet to stand down during their already shortened opening. Providing the fleet fishing time with that dynamic stand down and start up tool is the most responsive means to avoiding chum, as opposed to pre set, static time and area closures before the fishery has begun.

### **Proposal 134**

PVOA supports proposal 134. Proposal 134 would restore fishing time in Area M that was reduced following the 2023 Board cycle. The fleet has shown that they can greatly reduce their chum bycatch through use of their adaptive management framework and expanding fishing time would increase the flexibility the fleet is able to operate under.

### **Proposal 135**

PVOA supports proposal 135. Currently, the Area M salmon fishery is the only seine fishery in the State with full retention requirements of all salmon. Other regions already have provisions

that allow for EO authority to require retention or release of species. Proposal 135 will bring the Area M seine fishery regulations in line with other seine fisheries in the State and provide the Department additional tools to reduce chinook retention and mortality.

PVOA thanks the Board of Fisheries for the opportunity to share our positions on the upcoming Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting. Please reach out if you have any further questions based on our comments. Thank you for your consideration.

Thank you,

A handwritten signature in cursive script that reads "Nels Evens".

Nels Evens  
Executive Director,  
Petersburg Vessel Owners Association  
[PVOA@gci.net](mailto:PVOA@gci.net)

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 grew up in King Cove, Alaska, and I visit every year with my two children. I grew up commercial fishing in Area M every summer.

Further reductions would mean lost income for my family members and reduce their ability to stay in the community. Closing the fishery would have a huge negative impact on the economy of King Cove. On top of the shutdown of the processing plant, the community will die. The community has already made budget cuts and jobs have been on the decline at the city, school, and local businesses. Fishing income is extremely important for the survival of King Cove right now.

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. Climate and habitat stressors are major drivers of declines and can't be "regulated away."

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

Rosanne Pletnikoff  
King Cove, 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 Arseny Polushkin. I am a permit holder, boat owner, and operator, and my family history and primary source of business income are tied directly to commercial fishing in Area M.

If fishing opportunity in Area M is reduced, I will experience a direct loss of income and fishing opportunity. Nearly 80% of my revenue is spent locally, supporting the local economy and helping keep small coastal communities operating.

Area M fisheries have already taken significant steps through adaptive management to reduce chum harvest, and those efforts have been successful. Salmon runs vary by river system, and not all poor runs share a single cause. Further restrictions that remove flexibility from mixed-stock fisheries will only place additional strain on rural communities without addressing the underlying drivers of decline.

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,

Arseny Polushkin  
Kenai Peninsula, Alaska



**Submitted by:** Arseny Polushkin

**Community of Residence:** Voznesenka

Members of the Board,

My name is Arseny Polushkin. I am an Alaskan citizen, a second-generation commercial fisherman, and the father of four boys—three of whom are fishermen. I fish Area M as a drift gillnet fisherman, primarily in the South Unimak Sections and the North Peninsula Sections, including but not limited to Outer Port Heiden, Bear River, Ilnik, and Three Hills, and I strongly support access to Caribou Flats and Nelson Lagoon when biologically warranted.

I am here to speak clearly, consistently, and in good faith about the proposals before you.

Foundational Position

Area M fishermen do not oppose conservation.

We practice conservation every single season.

Over the last six years, Area M fishermen voluntarily:

Instituted stand-downs

Reduced fishing time beyond regulatory requirements

Took economic losses to allow more chum salmon to pass, specifically out of empathy for Yukon–Kuskokwim communities that have endured a decade of closures

That is not theoretical conservation. That is real conservation, paid for out of fishermen’s livelihoods.

What we do oppose is being made the default scapegoat for system-wide salmon problems while other intercepting fisheries, bycatch sources, and mixed-stock harvests are either untouched or expanded.

Core Principle the Board Must Apply Consistently

Conservation must reduce total interception, not merely redistribute fishing pressure.

Many of the proposals I oppose do not reduce interception.

They shift it—by gear, by district, or by calendar—often increasing conflict and concentrating effort elsewhere.

That approach fails biologically and socially.

Proposals I OPPOSE

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

Why I Oppose These Proposals (Grouped by Impact)

#### 1. Gear-Targeted Closures That Do Not Reduce Interception

Several proposals single out specific gear groups or districts under the banner of conservation while leaving total interception unchanged.

When fishing time or area is removed from one group:

Effort moves

Pressure concentrates

Conflict increases

Conservation does not improve

Closing one door while opening another is not conservation.

## 2. Codifying Emergency Orders Into Permanent Regulation

Multiple proposals attempt to turn Emergency Order tools into fixed regulatory mandates.

Emergency Orders exist for uncertainty and adaptation.

Regulations exist for predictability.

Hard-coding EO logic removes flexibility and locks future managers into today's assumptions, even when those assumptions change.

That is poor fisheries management.

## 3. Disproportionate Conservation Burden

Area M fishermen are repeatedly asked to shoulder restrictions first, longest, and hardest, even though:

We are not the only interceptors

We are not the only mixed-stock fishery

We are not the only source of chum interception

The Alaska Sustainable Salmon Policy requires the burden of conservation to be shared.

Several of the opposed proposals violate that principle by design.

## 4. Policies That Push Other Gear Groups Into Area M

Closures and restrictions imposed elsewhere do not eliminate effort—they displace it.

When other gear groups are boxed out of their traditional areas, they are pushed into:

South Unimak

North Peninsula

Nearshore mixed-stock corridors

That increases gear conflict, crowds fisheries, and raises safety risks, without improving escapement.

## Proposals I SUPPORT

113, 114, 115, 119, 121, 122, 123, 124, 134, 135, 139, 142, 144, 145, 150, 153, 154, 156, 157, 158, 159, 160, 161, 188

### Why I Support These Proposals

#### 1. Adaptive, In-Season Management

I strongly support proposals that:

Use Emergency Order authority appropriately

Respond to real-time escapement data

Adjust fishing opportunity when runs are clearly over- or under-escaping

Caribou Flats is the clearest example.

Caribou Flats / Nelson River – Critical Point

The Nelson River has over-escaped for three consecutive years, by hundreds of thousands of sockeye, when the system can biologically support approximately 200,000.

Chronic over-escapement:

Reduces future productivity

Wastes harvestable surplus

Harms long-term sustainability

Caribou Flats desperately needs EO-based management, not rigid closures that ignore biological reality.

Supporting EO tools here is pro-conservation, not pro-harvest.

## 2. Balanced Allocation and Concurrency

I support proposals that:

Address outdated allocation formulas

Re-examine assumptions like fixed percentages and historic fleet sizes

Seek concurrent opportunity rather than serial exclusion

Concurrency reduces pressure, spreads effort, and lowers conflict.

## 3. Reasonable Sport Fish Conservation Measures

I support sport fish proposals that:

Protect king salmon

Are proportional to actual impact

Do not pretend sport harvest alone is driving system-wide declines

Conservation must be honest about scale.

Closing to the Board

Area M fishermen are not asking for special treatment.

We are asking for consistent treatment.

We have:

Conserved voluntarily

Accepted closures

Absorbed economic loss

Acted in solidarity with other regions

But we cannot be the permanent shock absorber for every salmon problem in Alaska.

If conservation is necessary, it must:

Reduce total interception

Be shared across all intercepting fisheries

Remain adaptive, not frozen in regulation

Avoid turning fishermen against one another

I urge the Board to reject proposals that merely shift pressure, and adopt those that reflect adaptive, biologically sound, and equitable management.

Thank you for your consideration.

**Submitted by:** Christian Porter

**Community of Residence:** Sand Point/Wasilla

Oppose prop 147

My issue is only seine Gear Is mentioned in the wording.

In favor of prop, 149

My only issue is the wording, What I believe Virgil was trying to say is that a permit holder should be able to have two nets or one net at a longer length.

In favor of prop, 150

Monofilament is cheaper to purchase and doesn't catch algae and other debris as easily. I also believe other gillnet fisheries around the state utilize monofilament

I oppose prop 151

I oppose getting rid of the leads, but I am in agreement on offshore fishing.

In favor of Prop 153

Mono filament is cheaper to purchase and doesn't catch algae and other debris easily. I also believe other fisheries around the state utilize monofilament.

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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 income has already been severely affected by low sockeye returns in the North Peninsula fishery. The cost of doing business in the Area M fishery is one of the highest of any salmon fishery in Alaska. Between boat and home mortgages, vehicle payments, medical insurance, and other fixed expenses, further limitations on the Area M salmon fleet would bankrupt numerous families.

It is already extremely difficult to retain returning crew members due to low salmon prices, and any additional reductions in fishing time would make that nearly impossible.

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,

Rayburn Pride  
Port Moller, Alaska



**Submitted by:** Kirick Reutov

**Community of Residence:** HOMER, ALASKA

To whom it may concern:

Hello, My name is Kirick Reutov, on the F/v Quantum. I started fishing in area M with my dad as a deckhand 18 years ago, and now have been running a boat for 8 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

I oppose proposal numbers: 108-112,116,117,118,120,126-133,136,140,141,143,147,148,151,152.

Area M is accused as being the culprit for failing fisheries and underperforming river escapements (AYK region), year after year our fishery has been the scapegoat. Meanwhile, multiple scientific studies (WASSIP, 1987 ADFG Tagging Study, 2025 June fishery chum genetics sampling, 2025 Chum radio tagging project) have indicated otherwise. The area M fishery has always used science backed information in order to defend against false accusations and properly regulating the fishery. These reports have pointed to warming waters, other fisheries, and various other factors as the culprit for AYK chums not returning to their spawning grounds, not Area M fishermen.

Please vote to oppose any proposals that would put any more strain on an already struggling fishery, thank you for your support.

**Submitted by:** Mark Reutov

**Community of Residence:** Homer

I rely heavily on the Area M drift gillnet fishery to keep up with my bills. Limiting fishing time, or closing districts would be disastrous to an already struggling fishery.

**Submitted by:** Mavrik Reutov

**Community of Residence:** Homer

To whom it may concern: Hi my name is Mavrik Reutov I run and own the boat f/v Concord. Born and raised in alaska and been fishing all my life. Fished in area M since I was 10 years old, owned and ran a boat since 17 years old. Now iam 32 and my son is 13 been fishing with me for 2 years already and he loves fishing, would be awesome for him to have a fishery and a chance and a future to fish in Area M

I support proposal numbers

113, 114, 115, 119, 121, 123, 124, 134, 135, 137, 139, 142, 144, 145, 150, 153, 154, 156 - 160, 188.

I oppose proposal numbers

108 - 112, 116, 117, 118, 120, 126 - 133, 136, 140, 141, 143, 147, 148, 151, 152.

Every board of fish meeting cycle, it seems to me, 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 chum ratio tagging project) have indicated otherwise. Science backed reports have pointed to warming waters and other fisheries as the culprit for ayk chum not Area M fisherman.

Please consider opposing any and all proposals that would hurt and limit our struggling fishery.....

Thank you for your time and consideration

**Submitted by:** Nikofor Reutov

**Community of Residence:** Afognak AK

To whom it may concern: HI my is Nikokor Reutov on F/V MY OAR I've been fishing area M since 2010 with my dad as of deckhand and now I'm fishing by myself on the f/v My oar so I support proposal number: 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 ADF&G 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 asthma culprit for AYK chums not returning to their spawning grounds, not area M fishermen. please consider opposing any and all proposals that would any undue strain on an already struggling fishery. Thank you for your time and consideration.

---

**Submitted by:** Sofron Reutov

**Community of Residence:** Homer alaska

To whom it may concern:

Hello my name is Sofron Reutov fishing vessel Allegiance.

I have been fishing area m since 1993.

I support proposals 113-115,119,121-124,134,135,137,139,142,144,145,150,153, 154,188

I oppose proposals 116-118,120,136,140,141,143, 147,148,151,152

Since 1993 I remember Area M was always targeted to be shut down because of (AYK REGION).

Sampling was in prior years and that showed that Area M June fishery was not the problem to chum decline in (AYK Region).

Drift and Seine Area M fishermen were standing down for a significant amount of hours during the openers for a few years

That seems to be not the issue chums are still not showing up to AYK Region.

Shutting down June fishery would DEVESTATE

Specially the young generation who just started and try to make a living.

Please consider the fact that Shutting Area M June fishery will not solve much of chum returns to AYK Region.

It has been proven a few times,

I am asking please expand your horizons and see what is causing AYK Region chum supply not returning to their spawning grounds.

Please consider not to shut down struggling fishery as it is already right now.

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:

I was born and raised in Alaska, and I started fishing in Area M when I was nine years old. I still fish in Area M today, and it has been a major part of my life and my family's future.

If the Board reduces the time to fish in Area M, it will affect my family drastically. A lot of fishermen—including me—have not been bringing money home after fishing due to high expenses and bad seasons. If we get fewer days to fish, most of us will be going backwards and will likely start losing boats and permits.

I have two kids who are looking forward to following in my footsteps and fishing in Area M when they grow up. If we get fewer days to fish, I won't be able to make payments for my boat and permit, and that will affect my future and my kids' futures.

Salmon fishing is the main fishery that brings the most income, and it's how we squeeze by to the next year. We already take days off to reduce chum harvest. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim chum and Chinook declines, and Area M has already reduced chum harvest through adaptive management, which has been successful.

It seems like every Board of Fisheries meeting cycle, Area M is accused of being the culprit for failing fisheries and underperforming escapements in the AYK region, while multiple scientific studies and efforts do not support that narrative. Reports have pointed to warming waters and other fisheries as major drivers for poor AYK chum returns, not Area M fishermen. Please consider opposing any and all proposals that would place more undue strain on an already struggling fishery.

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.

Respectfully,

Timon Reutov  
Alaska (born and raised)



**Submitted by:** Viktorin Reutov

**Community of Residence:** Afognik

To whomever it may concern: hello my name is viktorin reutov I run the f/v alliance born and raised here in kodiak alaska. Had my family fish in area m since I could remember, love fishing thier but its been hard the past few years so hopefully we won't see any closers

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

I oppose proposal numbers

108-118, 116,117, 118,120,126-133,136,140,141,143,147,148,151,152

Every board of fish meeting cycle,it seems to me, Area M is accused as being the culprit for failing fisheries and underperforming river escapements (AYK WASSIP, 1987 adfg tagging study,2025 June fishery chum genetics sampling 2025 chum ratio tagging project) have indicated otherwise. Science backed reports have pointed to warming waters and other fisheries as the culprit for AYK chum not returning to thier spawning grounds,not Area M fisherman

Please consider opposing any and all proposals that would hurt and limit our struggling fishery, need to feed the family like everyone else fishing and survive

Thank you for your time and consideration

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**Submitted by:** Bridget Rocili

**Community of Residence:** Sand Point

### Opposition to Proposals Affecting Area M Fisheries

My name is Bridget Rocili. I grew up in King Cove and now reside in Sand Point. I also work for the City of Sand Point. I am submitting this public comment in opposition to proposals 108, 109, 110, 111, 112, 116, 120, 126, 127, 129, 130, 131, 132, 133, 140, 141, 143, 148, and 152 because they would negatively affect Area M fisheries and the communities that depend on them.

While I do not personally fish anymore, commercial fishing does impact my life. I have lived in fishing communities my entire life. I was raised in one and I am raising my children in one now. Fishing has always been the backbone of the places I call home. It shapes the local economy, the rhythm of daily life, and whether families can stay or are forced to leave.

My children come from a long line of fishermen on their father's side, and roughly half of my household's income depends directly on Area M fisheries. These issues are not abstract policy discussions for us. They affect whether our family can remain here, whether our community stays viable, and whether our children have the opportunity to build their lives in the same places that raised them.

I recognize that there are serious concerns and real hardships being experienced in other regions, and I respect that subsistence and fishing cultures across Alaska matter deeply. However, complex fisheries challenges should not be addressed in ways that disproportionately harm Area M communities when it has not been clearly shown that these measures will lead to meaningful improvement elsewhere.

From both a community and municipal perspective, the impacts of reducing or eliminating fishing opportunities in Area M are immediate and severe. Fish tax revenue from these fisheries supports basic city operations, schools, and essential services. When fishing opportunity is reduced, the effects are felt everywhere. Businesses struggle, families leave, schools lose stability, and cities lose the ability to function. There is no alternative revenue source waiting to replace this loss.

Area M fishermen have already made significant sacrifices. Chum harvests are actively managed, fishing time has already been reduced, and those reductions have been followed. These actions reflect a fleet that understands conservation and long-term sustainability because their future, and the future of their communities, depends on it.

Further restrictions or shutdowns would not be minor adjustments. They would erase livelihoods and dismantle communities that have already adapted to substantial management changes. Cultural loss does not happen in isolation. When one part of a community's way of life is damaged or removed, the effects spread to families, children, businesses, schools, and the long-term future of the place itself.

I oppose these proposals and urge the Board to reject measures that negatively impact Area M without clear and conclusive evidence that such actions are necessary or effective.

Thank you.

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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 King Cove community member. My family worked for Peter Pan for many years in processing and fishing, including my Grandpa Lloyd Guffey, Vice President; my Dad, Eufemio "Beach Boss Jr" Rocili, Dock Boss; and my Uncle Glenn, Plant Manager. Both my dad and uncle are retired from Peter Pan. I have many other relatives that were employed by Peter Pan as well, myself included.

This would affect all of us in all aspects. We already have so many community members moving from King Cove due to the closure of our only plant. We are losing so many opportunities for our community and the future of our children in King Cove. With that loss of income, many families are turning to state and tribal assistance programs to ensure they have food and funds to go toward fuel and electric.

Decreasing more fishing would completely hurt our communities. Local businesses, including the bar I run, have already been hit hard by the lack of fishing.

The numbers are dwindling fast for our population. Community members will be reaching out for more assistance to continue living in King Cove. Local businesses will be cutting down more on hours or even shutting down completely due to lack of revenue. We will have more people moving out of town to find better job and living opportunities for their families.

In 2023, losing our only fish-processing plant, Peter Pan, resulted in an almost 80% reduction in revenue for the City of King Cove in 2024. Fishermen and their families were left to find new fisheries to make a living. Local businesses and their employees were affected by hours being cut and positions being removed to save money. Peter Pan was our community's pillar of strength for many years.

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.

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,

Corazon Rocili

  
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:

Fishing is our culture, and my family history spans the Aleutian Islands. Most of my family members commercial fish for a living, and although times have been tough, it is what is keeping them in King Cove.

We have already lost our cannery. Families are already leaving. Please do not give us another reason to leave our home. If Area M fisheries are restricted further, our community risks becoming a ghost town.

Respectfully,

Sierra Rocili  
King Cove, Alaska



**Submitted by:** Cheryl Roof

**Community of Residence:** Sand Point

My name is Cheryl Roof, and I am part of the Qagan Tayagungin Tribe, and I grew up in Sand Point. I'm representing my family.

I come from a family that has fished for generations in Area M. My husband has fished with my dad, my grandmother was born here and comes from a family that was sustained from fishing in our region. I have three children who love to fish.

Currently I work for the Aleutians East Borough School District, as the executive assistant to the superintendent. My children go to Sand Point School. We love our region.

The Aleutians East Borough is home to over 3000 Alaskans, many Aleuts that have a heritage that goes back hundreds of years. Our population has always been dependent on fishing. We have no other industry to sustain our communities. Through the years I can testify the small fleet of fishermen in our region have been faithful to keep our fisheries preserved, and our fisheries have been well managed.

We have been fighting this same battle for our fisheries for many years. We are fighting for our livelihood. We are very sorry about the hardship experienced in other regions. Scientific studies have demonstrated that environmental changes are the primary cause of changes in salmon harvest.

Proposals to shut down our area are not based on science, and yet they harm Alaskans and erode our ability to live in our homes.

Please Vote NO on Proposals: 127, 129, 130, 131, 132, 133 & 136, 108, 109, 110, 111, 112, 116, 120, 126, 140, 141, 143, 148, 152.

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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 fell in love with Sand Point 34 years ago. It is a town of generations of fishers that know nothing else. I have been running local fishing boats out of Sand Point for 34 years.

Every day Area M fishermen lose time, there are a couple dozen tenders with an average of four crew that lose the same time. This affects approximately forty-eight families that lose food on their tables.

The economic impacts to Area M communities are huge. Some of the proposals to shut down our June salmon fisheries would put a lot of boats out of business, as it would cost the players over thirty percent of their salmon incomes.

Our local communities have been shrinking because of nonsensical proposals that have turned into regulations without any scientific data to support them. In fact, the data shows the upriver problems are not caused by surrounding fisheries, but are caused by environmental issues such as global warming and uncontrolled farm fishing.

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. The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines.

Look at the science, and not the political gamesmanship.

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 Rotter

  
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 Jolan Rotter. I am a fisherman, fishing boat owner, and community member from Sand Point, Alaska. I have fished the Shumagin Islands and the Aleutians East Borough for 30 years.

If you take this fishery away from our community, it will be a giant loss of income for my family and myself. This is a main income source, and without it we will have to find other jobs or other fisheries to participate in, which will require us to move to different parts of Alaska and leave our beloved home we call Sand Point. The time that is already cut from our fishing is bad enough—we barely make it by in the month of June. With rising costs of fuel and insurance for my boat, it's hard enough already, and traveling further away to catch fish only increases those costs.

The negative impact would be devastating. A once thriving fishing town will be dwindled down to nothing and people will have to find other work and move. Funding for the town and school will be dwindled down because there will be no fish to tax.

These last three years where they shut down the Shumagin Islands in June really takes a toll on people. Some people don't have big enough boats to be able to travel out west to Unimak and fish there—boat size just won't work because it'll be too rough—so those smaller boats miss out on a lot of fishing time and end up not making any money for their crews.

Area M has already reduced chum harvest through adaptive management. 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.

Thank you for your time and consideration.

Respectfully,

Jolan Rotter  
Sand Point, Alaska

[REDACTED]

**Submitted by:** Amelia Rowland  
**Community of Residence:** Big Lake

Dear Board,

I am a lifelong commercial fisherwoman. My family has been commercially fishing in Kodiak, Bristol Bay, Chignik, and other parts of the state for 5 generations, and my children fishing with us now make it 6. My husband and I now primarily fish in Chignik on our boat, the FV Freedom.

108 - I disagree with this proposal. ADF&G is not required to open this area so it can do no harm, and I don't believe they should be required to keep it closed should they wish to open it. I was happy to see this proposal make it through in the past and would be sad to see it go away so quickly. I favor more freedom, more fishing area, and more ways ADF&G can create fishing opportunity, should escapement be made.

109 - This has been an important fishing area to my family. Taking this area from Central would limit our fishing opportunity, and it is important to us to have somewhere to work close to town with our long nets. We are happy to fish alongside boats with shorter gear and would not wish to push them out of a valuable fishing locations. I favor more area and opportunity for everyone.

110 - I would be in favor of giving up net depth only if we could get more net length. I have always been in favor of increasing Chignik's net length to 250 fathoms to match the length of Kodiak. My husband owns a Chignik permit, and I own a Kodiak permit. We have strong family ties to both areas and have gone back and forth over the years. Each time we switch we have to completely re-work our net to be legal in one area or the other. It would be extremely valuable to us to be able to use one net in either area. This would also be valuable on an enforcement level. We are extremely lacking in law enforcement in Chignik. Last year, in Chignik, we were fishing around many fishermen that came from other areas, and some didn't bother to shorten their nets. This gave them an unfair and illegal advantage over us, but nothing was done about it. If we had the same length that would eliminate this problem. I believe passing this proposal, with the amendment of increasing net length to 250 fathoms, would help conserve kings as well as make nets more consistent across the state.

Thank you for your time.

Sincerely,

Amelia Rowland

F/V Freedom

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Attention Board of Fisheries members

I have fished salmon in Chignik for 16 years and Kodiak for 3. I am writing this letter to address Chignik Management Area Proposals 108, 109, 110, 111, and 112.

-Proposal 108 seeks to reduce time and area to Chignik fisherman in the Western and Perryville districts in June based on CWAK salmon run weakness. I want to voice my opposition to this proposal. The Department of Fish and Game can already selectively open or close portions of the Western and Perryville districts based on chinook and chum harvest that is believed to be CWAK bound while still allowing Chignik fisherman to harvest surplus sockeye, chum, and pink salmon. The Department has closed portions of the Western and Perryville districts in the past to avoid harvest of certain salmon stocks, and I believe they would do it again should the need arise. I don't think the right way to try to reduce possible CWAK salmon stock harvest within the CMA is a blanket shutdown of all fishing opportunity in the Western and Perryville districts in June.

-Proposal 109 seeks to change the way district boundary lines are drawn within the CMA at a junction of the Central, Chignik Bay, and Western districts. I oppose this proposal. Currently fisherman wanting to fish the smaller "lagoon nets" are able to fish this point and they take turns with the fisherman who are fishing the bigger "cape nets" or they can go up in front and fish where the cape nets can't. What this proposal would do is take opportunity away from Chignik fisherman. The small area in question is approx. 11 miles away from the Chignik lagoon terminus, and it is depicted in Figure 5-Map of "Jack's Box" in the Chignik Salmon Management Plan.

-Proposal 110 seeks to reduce "Cape Seine" gear depth within the CMA (to lessen harvest of Chinook salmon) and clarify an omission in the "lagoon Seine" net regulation. I support the depth reduction portion of the proposal **only if an additional 25 fathoms of gear can be used in the Eastward, Central, Westward, and Perryville districts, (total aggregate length of seine and lead may not exceed 250 fathoms)**. It is time that Chignik fisherman are allowed to fish a more competitive net similar to our fellow fisherman to the north in Area K and to the South in Area M. Recent changes to net regulation in Prince William Sound leaves CMA fisherman fishing the shortest seines in the state. With ever rising costs to operate, it's time that we can be a more efficient and competitive fleet.

-Proposal 112 seeks to implement a comprehensive salmon harvest management plan to reduce Chinook harvest. I oppose portion **1 b** of this proposal. Last season, during the time period addressed, stakeholders fished in the westward district under the same regulation that is specified in portion **2** of this proposal and Chinook escapement returned within the escapement goal. The 1,000 king "harvest cap" seems more than sufficient to reduce king harvest in this area. If more drastic measures are needed to reduce king harvest consider lowering the "king cap" to 750 kings. If this proposal is passed as it is written it will have a significant detrimental effect on the viability of the Chignik fishery and further devalue our fishery as a whole.

Sincerely, Axel Rowland

**Submitted by:** Roger Rowland

**Community of Residence:** Unalaska, Alaska

I am Roger Rowland from Unalaska. [REDACTED]

I have been fishing Chignik since 1985.

I'm opposed to proposal 108. The current regulations state that the department may open etc, etc, etc, not that they must. If the Department feels there is a conservation issue they can leave it closed. I am opposed to removing management tools from the Department.

I am opposed to proposal 109. Currently both gear lengths allowed in the Chignik Management Area (125 fathoms in the Chignik Bay district and 225 fathoms in all other districts) can fish Jack's Bay Point. The shorter length nets can also be fished legally farther up the beach in front of Jack's Bay Point while the longer nets cannot. I am opposed to limiting fishing opportunities for certain Chignik fishermen.

I am opposed to proposal 110 as written. While I agree with efforts to conserve Chinook salmon, I dislike giving up fishing efficiency. I would support the shallower depth if we could have an extra 25 fathoms in length. This would make us comparable to most of the rest of the state while still allowing Chinook to pass. I encourage you to consider amending this proposal to include striking 225 and adding 250 in 5AAC 15.332 (a) and (b).

I am in favor of proposal 111. This lets the department be more precise in avoiding Chinook catch. I support giving the department more management tools.

I am opposed to proposal 112 as written. If proposal 111 is adopted then (1),(b) of proposal 112 should be changed to reflect which of the two areas the department sees as a problem. Also the 1,000 fish harvest cap in (2),(b) is sufficient to stop Chinook Harvest.

Thank you, Roger Rowland

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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 Craig Rysewyk, and I am a third-generation fisherman from Nelson Lagoon, Alaska. I am a permit holder and community member, and I am writing in opposition to any further reductions in time, area, or opportunity for 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.

Commercial fishing is the bloodline of our village. Commercial fishing is all we have in Nelson Lagoon. We have already lost a long-time processor, and with that loss came reduced time to fish. Our fishing window is already small, and any further loss of time would be devastating to our community.

The closing of the cannery in Port Moller changed everything for us. We now rely on Silver Bay to buy our fish. June and early July are the best fishing times for our community, and we need every opportunity to utilize that time to support our families and keep our community viable.

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 cannot be regulated away by further restricting small coastal communities.

Further restrictions would hit small rural coastal communities hardest. These proposals would not solve broader ecological challenges, but they would accelerate economic decline and threaten the survival of communities like Nelson Lagoon that depend entirely on commercial fishing.

Thank you for your time and consideration.

Sincerely,

Craig Rysewyk  
Nelson Lagoon, 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 Herman Samuelson. I have fished out of King Cove and False Pass my entire life, throughout Area M.

Further reductions would be devastating. Our fishing opportunity is already declining, and things are already heading downhill for our communities.

Area M has already reduced chum harvest through adaptive management, and those measures have worked. Additional restrictions would only create bigger losses for fishermen and small coastal communities while failing to address the real causes of salmon 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.

Thank you for your time and consideration.

Respectfully,

Herman Samuelson  
King Cove / 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:

The community of King Cove needs support now more than ever, especially with the loss of local processing capacity. If we lose our fisheries, King Cove will become a ghost town. A lot of good people live there, and many are already being forced to move out because the cost of living is sky-high as it is.

Further restrictions would hit small rural coastal communities the hardest. Runs vary by river system, and not all poor runs share a single cause. 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.

I respectfully oppose Proposals 108–112, 116, 117, 118, 120, 126–133, 136, 140, 141, 143, 147, 148, 151, and 152.

Respectfully,

John Samuelson  
Former King Cove Resident



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 Maggie Samuelson. I grew up in King Cove and come from a fishing family.

Commercial fishing is the main source of income for my brothers and other family members who live in the region. Any reduction in fishing opportunity directly impacts their ability to stay in the community and support their families.

I can already see people moving away, and that affects every part of community life. When fishing declines, schools, businesses, and services all suffer.

The June Area M fishery is not the primary driver of AYK chum and Chinook declines, and runs vary by river system. Further restrictions would harm local communities without solving the real problems.

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,

Maggie Samuelson  
King Cove, Alaska



**Submitted by:** Daniel Schindler

**Community of Residence:** Seattle, University of Washington

I am providing the attached comment to provide a scientific perspective on the concern for 'over-escapement' in Bristol Bay sockeye salmon watersheds. This issue will likely be brought up in discussions of proposals that seek to reduce fishing time to Area M fishers.

see attached

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**To: Alaska Board of Fisheries**

**From: Daniel Schindler, PhD.** Professor of Aquatic and Fishery Sciences, University of Washington; [REDACTED]

**RE: Do South Peninsula June fisheries prevent 'over-escapement' of sockeye salmon in Bristol Bay watersheds?** (as relevant to Proposals 127, 129, 131, 136)

Date: February 3, 2026

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A common assertion in discussions of the June sockeye salmon fishery off the Alaska South Peninsula is that harvesting Bristol Bay sockeye here helps prevent the biological damage caused by 'over-escapement' of fish to Bristol Bay watersheds by reducing the number of fish that return to Bristol Bay fishing districts. The point of my comment is to dispel this myth.

There may be good economic reasons for the processing sector to want to spread sockeye harvests out over a longer season to prevent saturating processing capacity in Bristol Bay during large runs. However, there are no legitimate evidence-based biological reasons that Area M June fisheries would prevent 'over-escapement' and its supposed biological consequences, as outlined below.

The reasons South Peninsula June fisheries do not prevent 'over-escapement' in Bristol Bay are as follows:

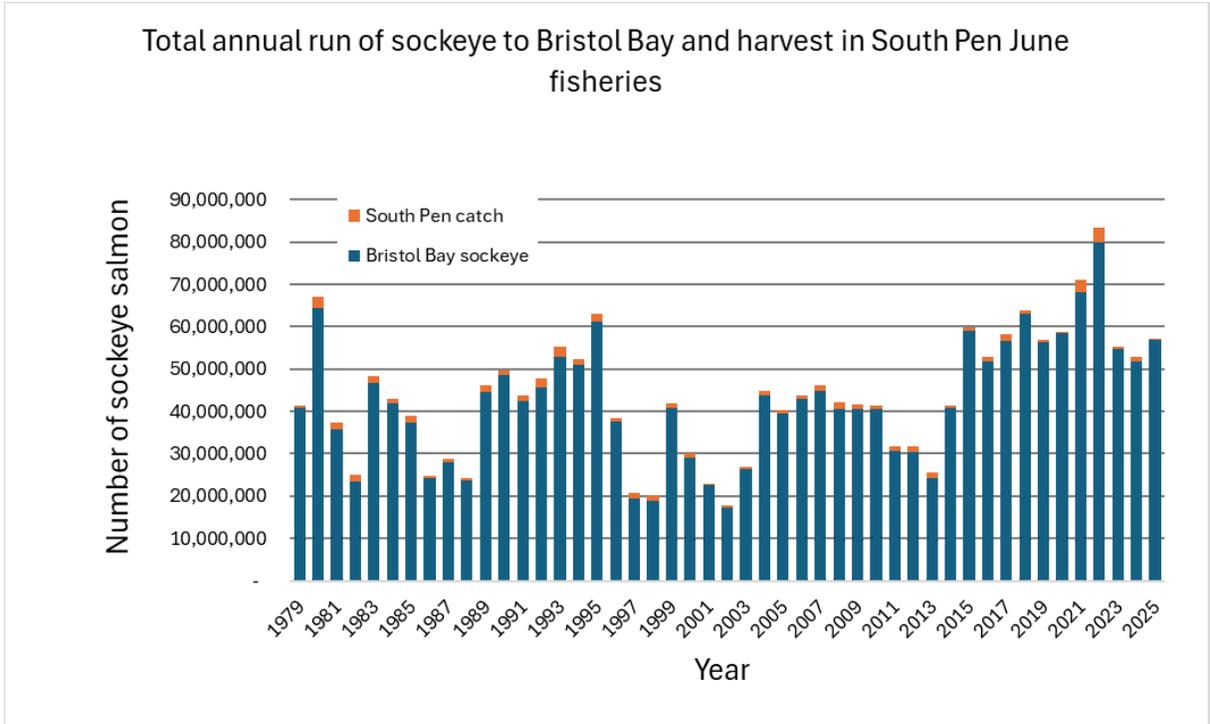
**1) South Peninsula June fisheries catch a small fraction – less than 3% - of the Bristol Bay sockeye salmon run**

As shown in Figure 1, only a very small fraction of the total annual Bristol Bay run of sockeye salmon is harvested in the June fishery on the Alaska South Peninsula. From 1979 – 2025 the average percent of the Bristol Bay sockeye run that was harvested in this fishery was 2.9% (average of 1.2M sockeye per year). **From 2015-2025, the run size of Bristol Bay sockeye reached record levels and has averaged almost 61M fish per year, yet during this time period only 1.9% of the run was harvested in South Peninsula June fisheries.** While it is true that escapements in Bristol Bay tend to increase in years with very large runs, the number of fish harvested in South Peninsula Fisheries would do little to change the escapements. This number of fish harvested is so small relative to the size of the total annual runs that it would probably be impossible to even statistically detect South Peninsula harvests in the escapement projects across Bristol Bay. It certainly is not large enough to have biological consequences for the population dynamics of Bristol Bay sockeye stocks.

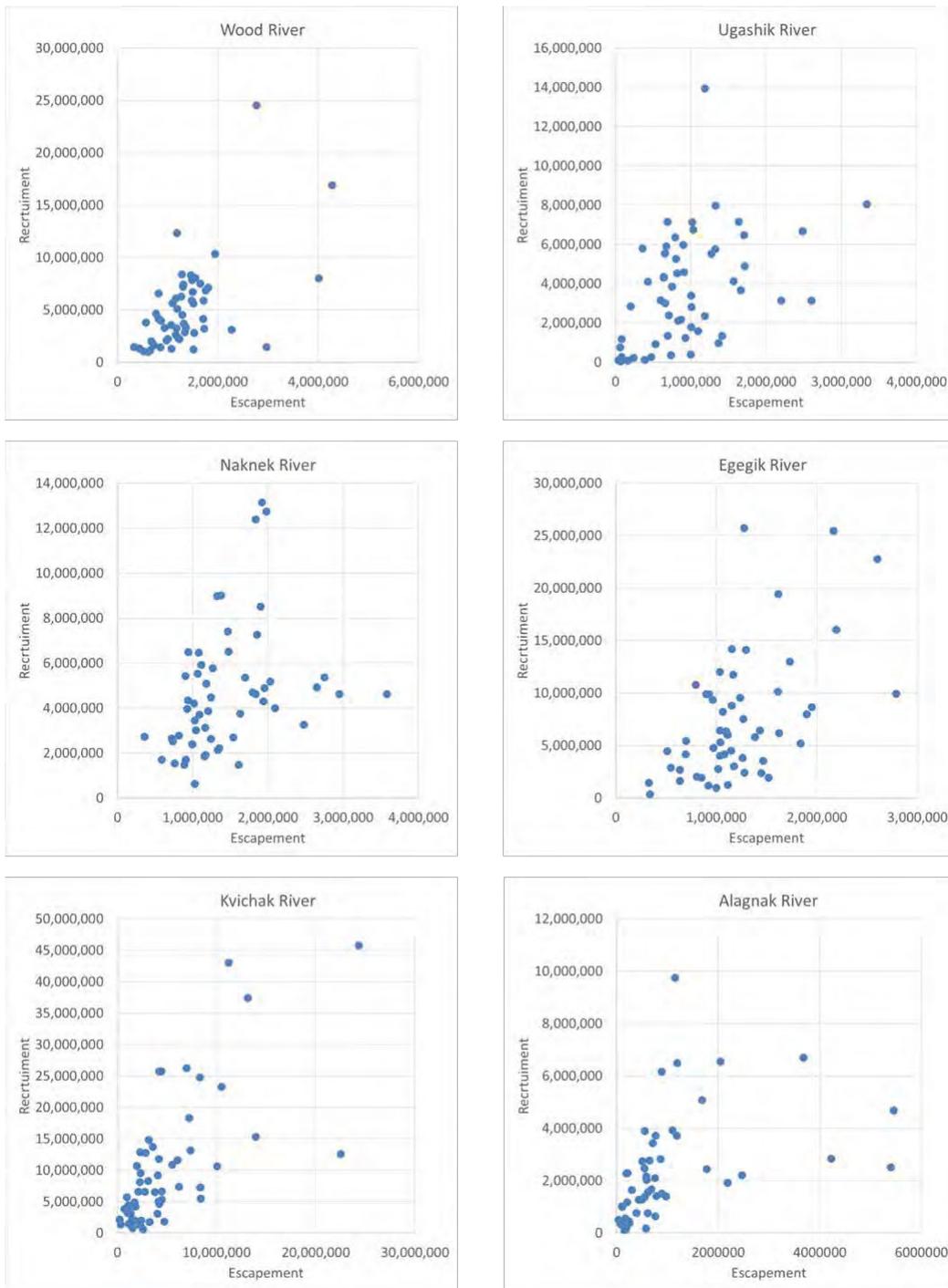
**2) There is no evidence that ‘over-escapement’ depresses sockeye salmon recruitment following high escapements to Bristol Bay rivers.**

**Even if South Peninsula June fisheries harvested a non-negligible number of Bristol Bay sockeye salmon, there is no evidence in the data that ‘over-escapement’ causes depressed recruitment in rivers following large escapement events.** Figure 2 shows the relationships between sockeye escapement and the subsequent recruitment for six of the major sockeye producing watersheds in Bristol Bay (provided here as examples). These graphs emphasize how variable the relationships are between escapement and the subsequent recruitment to the next generation of fish. It is important to note that large runs and small runs can be produced from both low and high levels of escapement. There is no indication that large escapements systematically produce low recruitment – as the ‘over-compensation’ argument asserts. If anything, there is a tendency for large escapements to produce high recruitment. Even though the observations included in these plots include escapements that are as much as 200-300% higher than the escapement goals, there is no evidence of any depression in subsequent recruitment as expected from ‘over-escapement’.

It is reasonable to treat over-escapement as an economic issue, whereby fish that were passed through to the spawning grounds could have been harvested because they contribute so little to spawning potential at high escapements (i.e., this would be *foregone harvest*). However, there is no indication of any negative biological consequences of high escapement on subsequent recruitment.



**Figure 1. Total sockeye salmon run size to Bristol Bay from 1979-2025.** The components of the annual run harvested in South Alaska Peninsula June fisheries are shown as the orange cap on each bar. On average, South Peninsula June fisheries caught 2.9% (std. dev. = 1.5%) of the total annual run to Bristol Bay over this time frame. It was assumed that 85% of the sockeye salmon harvested during the South Peninsula June fishery were of Bristol Bay origin (WASSIP). Data provided by the ADF&G.



**Figure 2. Relationships between escapement and subsequent recruitment for sockeye salmon in six major rivers in Bristol Bay, for brood years 1963-2017. There is no evidence for depressed recruitment at very high escapements. Data provided by the ADF&G.**

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 am writing to express my strong support for the protection of Area M and the vital resources it provides to our communities. These proposals directly impact our subsistence way of life, our culture, and the well-being of our families.

As residents of Unalaska and the Aleutian Islands, we depend on Area M for survival and cultural heritage. Subsistence fishing is not just about food—it is the foundation of our traditions, our connection to the land and sea, and our responsibility to our elders and children.

Salmon returns are already declining, and it is becoming increasingly difficult to stock our shelves and freezers for the year ahead. Further restrictions would jeopardize our ability to practice subsistence traditions passed down for generations—drying, smoking, and preserving fish, and teaching our children healthy ways of living.

The fish define who we are. Our ancestors relied on these resources, and we must protect them for future generations.

I respectfully ask the Board to prioritize the long-term sustainability of Area M and the communities that depend on it.

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,

Marie Schliebe  
Unalaska, Alaska



**Submitted by:** Debi Schmit

**Community of Residence:** Sand Point, AK

I do not support any proposals that further restrict fishing time in Area M. The Area M Seiners are managing the fishery by the minute, which is the best conservative plan. The Board of Fish is managing fishermen rather than using science to manage the fishery. Our families and governments depend on the resource to survive, and with the current restrictions, we are barely surviving. Please, no more restrictions or cuts to our fishery.

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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 Kristina Scott. I live in Sand Point year-round and work for the city at the harbor.

Further restrictions on Area M fisheries could cause me to lose my job. My roommate also works locally, and without our income we would not be able to afford rent. His son attends school here. For many people in this community, fishing and fishing-related work are all that exist—there are very few opportunities outside of the fishing industry.

If fishing is reduced further, many of us would lose our jobs. So much of our local economy is tied directly to fishing. These impacts would not stop with individual workers; they would affect families, schools, and surrounding communities. It would completely destroy this town and others like it.

Further restrictions would hit small rural coastal communities hardest. Removing management tools and flexibility makes it harder to manage mixed-stock fisheries, and climate and habitat stressors cannot be regulated away by cutting fishing opportunity.

Please consider the real employment and housing impacts these decisions will have on people who live and work in Sand Point year-round.

Thank you for your time and consideration.

Respectfully,

Kristina Scott  
Sand Point, Alaska



**Submitted by:** Ethan Shangin

**Community of Residence:** Perryville

Prosal 112 support with amendment with the Chignik AC

Prosal 143 support with amendment with the Chignik AC

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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 fished in Area M during my high school years, and during that time it was clear how important this fishery is as a support system for people in the region. It provides work, stability, and a reason for people to stay engaged in their community.

Reduced fishing opportunities would limit people's ability to access the tools and resources they need to remain active and productive in the future. Fishing opportunities are essential for keeping people working and contributing to their communities.

The June Area M fishery is not a primary driver of Arctic–Yukon–Kuskokwim (AYK) chum and Chinook declines. When I was fishing set net, I did not observe high chum catches during that period.

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,

Isaac Shepard

[REDACTED]

False Pass, AK



(907) 209-3037

208 Lake St, Suite 2E  
Sitka, Alaska 99835[www.silverbayseafoods.com](http://www.silverbayseafoods.com)

**February 3, 2026**

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: **Oppose** Proposals 108 – 112, 116, 120, 126, 127, 129 – 133, 136, 140, 141, 143, 147, 148, and 152

RE: **Support** Proposals 135, 142, 144, 145

Chair Carlson-Van Dort and Board Members:

Silver Bay Seafoods is a fishermen-owned seafood processing company partnered with setnet, drift, and seine fishermen participating in Alaska Peninsula, Aleutian Island and Chignik salmon fisheries. Our primary processing facility in the region is in False Pass, and we also have fleet support operations in King Cove, Port Moller, and Sand Point. **Silver Bay Seafoods is aligned with the Eastern Aleutians Fisheries Coalition opposition to proposals 108 – 112, 116, 120, 126, 127, 129–133, 136, 140, 141, 143, 147, 148, and 152. We support proposals 135, 142, 144, and 145.**

## **June Fishery**

Our operations provide a critical market and services to the local fishing fleets on the North and South Peninsula, Aleutian Islands, and Chignik. The stability of these operations is heavily dependent on the June fishery for

which we see most of the summer harvest of the target species: sockeye. Supporting small boat fishermen in this remote, unforgiving region requires strong people and stable access to this sustainable resource – fishing provides 70% of the economic opportunity for this region.

Community services in the Aleutians East Borough—including schools, roads, harbors, public safety, and energy infrastructure—depend on the economic stability of the fishing season. A significant reduction in salmon landings would reduce tax revenue and Borough operating capacity.

Our business is interconnected to the fishermen and communities who rely upon this fishery.

### **Adaptive Management**

In 2023, the Alaska Board of Fisheries (BOF) took significant action to reduce fishing time, restrict fishing areas, “set triggers” to guide Alaska Department of Fish and Game (ADF&G) management, and formally approved the industry-led chum avoidance measures, also known as the Adaptive Management Program. These measures were primarily to provide for chum salmon passage during the June fishery, while still providing opportunity to harvest available surplus of sockeye.

The adaptive management program has clearly been successful in achieving its primary program goal of allowing passage of chum salmon when they are present in the June fishery (regardless of their origin). Average chum harvest has been reduced by 50% compared to the five-year average prior to implementation and 32% reduction compared to the ten-year average prior to 2022. ADF&G comments are clear, “the current management plan and industry-lead conservation efforts are effective tools to conserve CWAK chum salmon while providing harvest opportunity on salmon stocks with identified harvestable surplus.” The program goals are being achieved, although with great sacrifice from a fleet.

The adaptive management program has resulted in significant reductions in fishing opportunities and processing production for the sake of chum salmon passage. Since 2023, the adaptive management plan has resulted in a loss of an average of 291 hours of fishing time per year by the seine fleet alone. In 2025, the drift fleet collectively gave up 554 hours of fishing time across

twenty-eight vessels through its participation in the adaptive management program.

We recognize and share concern about the poor salmon returns seriously impacting subsistence users along the Yukon River. This is an important issue and we, like many Alaskans, have sought answers to the cause and explored remedies. State and federal researchers have described the situation as complex and primarily related to issues with near-shore marine survival, citing warming waters, food availability, increased marine mammal predation, fish disease, habitat issues, and other factors. Research has not pointed to harvest in other fisheries as the “smoking gun” cause or even the remedy to addressing these poor salmon returns.

Given the effectiveness of adaptive management to allow for passage of chum salmon in June, and the lack of evidence that further restrictions are necessary or warranted, we ask the board to support the current management plan and industry-led efforts.

### **Transparency & Accountability**

Silver Bay Seafoods has welcomed ADF&G staff into our facility for the last 4 years during June and July to conduct salmon samples for genetics, age, sex, and length data. ADF&G staff have been invited to live on campus, observe all deliveries, access all fish entering our processing facility, get information from staff, and take samples of fish at all hours of our operations without limitations. This research has been important to the fleet and the people of this region. We welcomed this research and transparency in the salmon harvest.

The processor role in the adaptive management program primarily includes accountability through data-sharing and program enforcement. Through technological advancements with Starlink and the adaptive management data-sharing application, we have improved communications and data-sharing with the fleet and ADF&G.

We have also been tasked by the fleet with ensuring compliance with the adaptive management program, and enforcing any penalties outlined in the program, if necessary. To date, fishermen have been 100% compliant with the program.

Area M fishermen have proactively requested increased enforcement and monitoring to protect the integrity of the record (see April 2024 letter to Col. Chastain). We applaud the Alaska Wildlife Troopers for their enforcement presence in the region, as enforcement is an important component of responsible fisheries management.

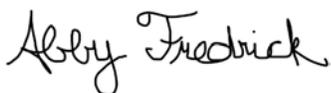
### **Additional Management Tools**

The proposals supported by the Eastern Aleutian Coalition provide additional management tools to ADF&G. Proposal 135 would allow ADF&G to require non-retention of king salmon as determined necessary during times of king salmon conservation; proposals 142 and 145 allow ADF&G flexibility to open individual (or multiple) fisheries at different times in August as opposed to opening all gear types concurrently; and proposal 144 would allow ADF&G to open the setnet fishery in August to test run strength and inform fishing opportunity for the other gear types.

Fishermen in this region have been responsible, proactive, innovative, and effective at finding adaptive solutions to complex fisheries management issues. We ask that you continue to support this work and request that you take no action on 108 – 112, 116, 120, 126, 127, 129 – 133, 136, 140, 141, 143, 147, 148, and 152.

Thank you for considering our comments.

Respectfully,



Abby Fredrick

Vice President External Affairs



**Submitted by:** Otis Sipary

**Community of Residence:** Saint Marys, Alaska

I think their should be more regulations on the trawlers. And all that bycatch they are throwing is really called wanted waste. They should be charged and permit taken away along with their boat.

---

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 grandparents were lifelong fishermen and cannery workers. Their entire lives revolved around fishing, and they raised a family of nine through this way of life. Fishing has long been the foundation of our communities and culture.

I wish I could live in the community today. To take something away, you must replace it with something else, and there is nothing that can replace the loss of fishing in these small rural communities.

Climate and habitat stressors are major drivers of salmon declines and cannot simply be regulated away. Further restrictions would disproportionately harm rural coastal communities that already face limited economic opportunities.

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,

Michael Sloan  
Alaska



Edgar Smith  
Sand Point, Alaska  
Area M Setnetter  
South Eastern District and South Eastern District Mainland of Area M

I am an elder, born in Sand Point, Alaska, and belonging to the Aleut tribe, I have participated in the setnet fishery since 1982. During this period, I have witnessed substantial regulatory evolution in the South Eastern District and Southeastern District Mainland, (SEDM) of Area M, particularly concerning salmon management strategies, fishing seasons, gear specifications, and conservation measures.

The South Eastern District setnet fishery exemplifies the "graying of the fleet" trend observed across Alaska's commercial salmon fisheries. Participation has declined markedly, from a peak of approximately 70 setnetters in the late 1980s to 24 permit holders in 2025. Of these, 6 did not fish, yielding 24 active participants. Among the 30 setnetters associated with the district, 20 exceed 55 years of age, compared to only 10 under 55. Family operations remain limited, with just three holding multiple permits and only two active in 2025. Many setnetters operate independently without crew.

Key regulatory developments in the South Eastern District since 1982 include:

- **1980s–early 1990s:** The fishery operated under foundational state regulations established following limited entry implementation in 1975. Management focused on basic season structures, gear limits, and escapement goals, with set gillnet gear predominant in nearshore areas. I entered the fishery in 1982 amid relatively stable participation levels.
- **Mid-1990s onward:** The Southeastern District Mainland Salmon Management Plan (codified in Alaska Administrative Code, e.g., 5 AAC series) emerged as a core framework, governing inseason adjustments, fishing periods, and allocations to balance commercial harvest with escapement and other user groups. Amendments addressed run strength variability, often restricting openings or modifying boundaries to protect weaker stocks.
- **2000s–2010s:** Regulatory refinements emphasized conservation, including adjustments to fishing windows (e.g., delayed or shortened openings in certain sections) and gear configurations to reduce bycatch or target specific salmon species. The plan incorporated escapement-based triggers for openings, with frequent inseason management by the Alaska Department of Fish and Game (ADF&G).
- **2020s:** Management continued under updated Southeastern District Mainland plans, with independent handling from June 1 through July 25 in many years.

Recent strategies, including the 2025 South Alaska Peninsula Salmon Management Strategy, maintained focused oversight of the SEDM, incorporating Pacific Salmon Treaty influences on Chinook salmon limits and release requirements (e.g., restrictions on retaining larger Chinook in certain periods). Gear and operational rules persisted with minimal broad changes.

Gear configurations in the fishery have remained consistent: average setnet depth is 60 meshes (3 ½ Fathoms or 21 feet deep), with mesh sizes of 4¾ to 5⅛ inches. Most operators use webbing exceeding 53-pound breaking strength and leadlines of 150 to 200 pounds. In 2025, of the 24 active setnetters, 5 utilized bowpickers without skiffs, while 18 fished from skiffs boat serving as primary living platforms.

These cumulative regulatory changes—driven by Board of Fisheries actions, stock assessments, and treaty obligations—have contributed to reduced participation and the aging demographic, posing challenges to long-term sustainability and generational transfer in the South Eastern District setnet fishery.

The declining participation and aging demographic in the South Eastern District setnet fishery of Area M have profound implications for Aleut (UnangaꝔ) culture, particularly in communities along the Alaska Peninsula and Eastern Aleutians, such as Sand Point.

Commercial salmon fishing, including setnetting, represents far more than an economic activity for Aleut people; it constitutes a cornerstone of cultural identity, social structure, and intergenerational continuity. UnangaꝔ communities have sustained a deep, centuries-old connection to the sea through fishing practices that blend traditional knowledge with modern commercial operations. Fishing provides not only sustenance and income but also reinforces communal ties, spiritual relationships with the ocean and salmon, and a sense of place. Disruptions to this fishery threaten the transmission of cultural practices, knowledge, and values.

The "graying of the fleet"—evident in the South Eastern District, where 20 of 30 associated setnetters exceed 55 years of age, with limited younger entrants and few family operations—mirrors broader trends in Alaska's salmon fisheries. Since the Limited Entry Act of 1975, which capped permits to promote sustainability, many rural and Indigenous communities, including those in the Aleutians and Alaska Peninsula, have experienced a substantial loss of local permit ownership and access. Permits have often transferred out of Native villages to non-local or urban holders, reducing the number of active Indigenous participants and hollowing out village economies.

This shift exacerbates cultural erosion in several ways:

- **Intergenerational knowledge loss:** With most setnetters operating independently and few multi-generational family operations (only three in the district, and just two active in 2025), opportunities for younger Aleuts to learn traditional and practical fishing skills diminish. This disrupts the passing down of navigational expertise, gear techniques, seasonal patterns, and cultural protocols tied to the harvest.
- **Economic and social stability:** Commercial fishing supports family income, community services, and subsistence supplementation. Declining participation contributes to reduced cash flow in remote villages, increased out-migration of youth seeking opportunities elsewhere, and weakened social cohesion. For Aleut communities, where fishing underpins local governance, education funding, and cultural events, such changes threaten long-term viability.
- **Identity and way of life:** Aleut identity is closely linked to being a "nautical nation" of coastal dwellers who harvest salmon commercially and for subsistence. Many residents view sustained access to fisheries as essential to preserving modern Aleut society. Disruptions—whether from regulatory changes, stock variability, or demographic shifts—risk eroding this identity, leading to broader cultural disconnection and stress on spiritual and communal health. The Aleuts invented the most seaworthy boat in the world, the bidar, the circle hook for fishing halibut, serrated edge knife of stone, like the vicky, baseball cap like the traditional aleut hunting hat.

These impacts align with statewide patterns observed in Alaska Native fisheries, where commodification of fishing rights, aging fleets, and reduced local access have dispossessed communities of cultural rights and traditional stewardship roles. In the South Eastern District, Edgar Smith's long career since 1982 highlights resilience amid regulatory evolution, yet the current trends underscore urgent challenges to sustaining Aleut cultural heritage through active, generational engagement in the setnet fishery.

## **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 harvest of 600000 to be more variable to fleet size.

The regulations established by the Alaska Board of Fisheries in 1985, as codified in 5 AAC 09.360 (Southeastern District Mainland Salmon Management Plan), allocate a priority harvest threshold of 600,000 sockeye salmon to the Chignik Area (Area L) fishery, divided into 300,000 for the early (first) run and 300,000 for the late (second) run. This threshold must generally be met or projected before commercial set gillnet

fishing in the Southeastern District Mainland (SEDM) can commence fully from June 1 through July 25, with seine gear permitted after July 11 if escapement goals are achieved. The SEDM fishery, which primarily consists of set gillnet operations along the South Alaska Peninsula, is allocated 7.6% of the total sockeye salmon harvested in the Chignik Management Area through July 25, based on an assumption that 80% of sockeye harvested in SEDM (excluding the Northwest Stepovak Section after July 1) are Chignik-bound. This framework aims to ensure sustainable escapement for Chignik River sockeye while accounting for interceptions in adjacent areas.

Historical data from the Commercial Fisheries Entry Commission indicates that in 1985, the Chignik purse seine fishery (permit type S01L) had 101 active permits, all of which were fished with no latency. By 2021, the number of issued permits had declined to 89, with only 31 actively fished, reflecting a latency rate of 65.2% and a broader trend of reduced participation due to transfers, migrations, and economic factors. Recent reports for the period 2018–2022 show further declines, with an average of 13–20 resident permits actively fished annually, and total active vessels often at 35 or fewer. For 2025, available summaries suggest participation remained low, consistent with approximately 38 active vessels as indicated in the query, amid ongoing challenges such as limited local processing and variable runs.

Regarding fairness to SEDM setnetters, the allocation has been subject to ongoing debate and proposals for revision, particularly in light of Chignik's reduced fleet size. The original 600,000 threshold was designed for a Chignik fleet of around 95–101 vessels, ensuring equitable distribution among participants while protecting the resource. With fewer active vessels now (e.g., 38 in 2025), the per-vessel harvest potential in Chignik increases substantially, as the fixed allocation is divided among fewer operators. This has led to arguments that the plan disproportionately benefits the remaining Chignik fleet at the expense of SEDM setnetters, who face delayed openings and capped harvests (limited to 7.6% of Chignik's total). Proposals before the Board of Fisheries, such as Proposal 123, advocate scaling Chignik's allocation based on active vessel counts: 200,000 sockeye (100,000 per run) for 30 or fewer vessels with SEDM receiving 21%; 400,000 for 31–60 vessels with 14% to SEDM; and retaining 600,000 only for 61 or more vessels with 7.6% to SEDM. The rationale emphasizes that current conditions—fewer vessels, no local processing in Chignik, and salmon tendering to other areas—render the fixed threshold outdated and inequitable.

Additionally, genetic stock identification studies (e.g., Western Alaska Salmon Stock Identification Program, or WASSIP) indicate that the proportion of Chignik-bound sockeye in SEDM harvests may be lower than the assumed 80% (ranging from 55–68% in recent analyses), suggesting the allocation overestimates interceptions and unduly restricts SEDM opportunities. From the perspective of SEDM stakeholders, this results

in economic hardship, as their fishery is subordinated to Chignik's even when local stocks are available, potentially leading to underutilization of resources and lost revenue. Conversely, Chignik advocates argue for maintaining priorities due to the fishery's historical dependence and vulnerability to low runs, noting that adjustments could exacerbate their challenges.

In substantive terms, the arrangement appears unfair to SEDM setnetters under current conditions, as the reduced Chignik fleet size amplifies per-operator benefits without corresponding adjustments, while SEDM operations remain constrained by thresholds that no longer align with fleet dynamics or updated stock data. This view is supported by multiple Board of Fisheries proposals calling for reforms to promote equity across fisheries.

**Adoption of Proposal 123: would likely represent a more equitable and fair regulation for Southeastern District Mainland (SEDM) setnetters**, based on data-driven considerations of fleet dynamics, allocation proportionality, updated stock composition information, and principles of shared conservation burden under Alaska's Sustainable Salmon Fisheries Policy (5 AAC 39.222).

The current framework in 5 AAC 09.360 (Southeastern District Mainland Salmon Management Plan) establishes a fixed allocation: SEDM set gillnet fishermen are entitled to approximately 7.6% of the total Chignik-bound sockeye salmon harvest (including Chignik Area harvests plus certain SEDM sections, excluding Northwest Stepovak after July 1), with the assumption that ~80% of SEDM sockeye (pre-July 1 in key sections) are Chignik-origin. This threshold—rooted in historical data and adopted to protect Chignik River escapement—delays or restricts SEDM openings until Chignik's harvestable surplus reaches specified levels (e.g., early-run thresholds around 300,000–600,000 sockeye, though exact triggers vary by run component).

This fixed percentage was calibrated when Chignik (Area L) participation was higher: ~101 active vessels in 1985, declining to averages of 13–20 resident/active vessels in recent years (2018–2022 data), and ~38 in 2025 per available reports. With fewer vessels sharing the same fixed harvest opportunity (e.g., the full 600,000 sockeye priority threshold split among ~38 operators), per-vessel catch rates and economic benefits in Chignik increase significantly. Meanwhile, SEDM setnetters—limited to a capped share and subordinate openings—face delayed access to mixed-stock fisheries, even when local terminal stocks (pink, chum, late sockeye) are abundant, resulting in lost harvest opportunities and economic hardship.

Proposal 123 (as described in prior analyses and aligned with recurring Board discussions) proposes scaling Chignik's allocation threshold based on active vessel participation:

- For 30 or fewer active vessels: Reduce to 200,000 sockeye (100,000 per run), increasing SEDM's share to ~21%.
- For 31–60 vessels: 400,000 sockeye, SEDM share ~14%.
- For 61+ vessels: Retain 600,000 sockeye, SEDM share 7.6%.

This tiered approach directly addresses the disproportionality created by fleet reduction. It would allow SEDM fishing time and harvest potential in years of low Chignik participation, better aligning allocations with actual fishing effort and economic realities. Genetic stock identification (e.g., from WASSIP and subsequent analyses) further supports this by indicating Chignik-origin proportions in SEDM harvests often fall below the assumed 80% (e.g., 55–68% in some periods), suggesting the current plan over-restricts SEDM unnecessarily to protect Chignik stocks.

From a policy perspective, this promotes fairness by:

- Sharing conservation burdens more equitably across user groups, consistent with 5 AAC 39.222.
- Reducing economic disparities between adjacent fisheries (Chignik's concentrated benefits vs. SEDM's constraints).
- Allowing better utilization of non-Chignik stocks in SEDM without excessive risk to Chignik escapement.

Opposition arguments (e.g., from Chignik stakeholders) emphasize historical dependence, vulnerability during low-run years, and potential risks to escapement if thresholds are lowered. However, the proposal includes safeguards (e.g., retaining full allocation at higher participation levels) and is data-supported by declining participation trends documented in Commercial Fisheries Entry Commission reports and ADF&G management summaries.

In summary, adoption would correct an outdated fixed-allocation mismatch with current fleet sizes, providing SEDM setnetters proportionally greater opportunity and economic viability—making it a more balanced, defensible regulation for Board consideration.

## **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 sockeye salmon to follow the WASSIP study of migrating sockeyes through SEDM

Genetic Stock Composition of Chignik-Bound Sockeye Salmon in Southeastern District Mainland (SEDM) Harvests: Analysis from 2010–2012 Data

This report evaluates the proportion of Chignik-bound sockeye salmon (*Oncorhynchus nerka*) in the commercial harvests of the Southeastern District Mainland (SEDM) fishery within the Alaska Peninsula Management Area (Area M) during the period from June 1 to July 25, based on genetic mixed-stock analysis (MSA) from the Alaska Department of Fish and Game (ADF&G) Special Publication No. 12-31 (Dann et al. 2012). The analysis is data-driven, drawing directly from empirical estimates to assess alignment with current regulatory assumptions under 5 AAC 09.360, which presumes 80% Chignik-bound sockeye in designated SEDM sections (East Stepovak, Stepovak Flats, Balboa Bay, and Beaver Bay) during this timeframe. The findings highlight temporal and annual variability, providing factual basis for debate on management adjustments, such as those proposed in Board of Fisheries (BOF) Proposal 124 (2026 cycle), which seeks to revise the proportion to 55–68% informed by prior Western Alaska Salmon Stock Identification Program (WASSIP) data (2006–2008). This 2010–2012 dataset, collected during higher Chignik run sizes compared to WASSIP years, offers updated evidence to support more precise allocation, ensuring shared conservation burdens under the Alaska Sustainable Salmon Policy (5 AAC 39.222) while balancing economic impacts on SEDM and Chignik Management Area (CMA) fisheries.

### **Methodology Overview and Data Context**

The study utilized genetic markers (single nucleotide polymorphisms) to estimate stock compositions from 6,725 tissue samples across 24 strata (8 per year: 3 temporal strata per section, plus annual summaries). Temporal strata were:

- Stratum 1: June 1–25 (early run, primarily Black Lake subregion within Chignik).
- Stratum 2: June 26–July 8 (overlap period).
- Stratum 3: July 9–25 (late run, primarily Chignik Lake subregion).

Reporting groups included Chignik (with Black Lake and Chignik Lake subregions), South Peninsula (Orzinski and non-Orzinski), North Peninsula, Bristol Bay, and East of WASSIP. Estimates are medians with 90% credible intervals (CI), stock-specific harvests, and standard deviations (SD). Total SEDM harvests during the period were 106,591 fish (2010), 196,419 fish (2011), and 180,390 fish (2012), with management tied to Chignik abundance thresholds (e.g., minimum 600,000 sockeye for SEDM openings). Unlike WASSIP (2006–2008), which occurred during low Chignik runs (leading to limited SEDM fishing and potentially underestimated Chignik contributions), this period featured above-average Chignik runs (2003–2012 baseline), providing a more representative dataset for strong-run scenarios.

### **Key Findings: Chignik-Bound Proportions by Stratum and Year**

Proportions of Chignik-bound sockeye varied by temporal stratum, decreasing from early to late periods, consistent with migration patterns where early migrants are predominantly Chignik-origin before shifting to local or eastern stocks. **Annual averages across the full June 1–July 25 period were consistently below the 80% regulatory assumption, averaging 66% (range: 65.4–66.7%).**

Year	Total SEDM Harvest (June 1–July 25)	Stratum 1 (June 1–25) Chignik % (90% CI; SD)	Stratum 2 (June 26–July 8) Chignik % (90% CI; SD)	Stratum 3 (July 9–25) Chignik % (90% CI; SD)	Annual Chignik % (90% CI; SD)	Annual Chignik Harvest (90% CI)
2010	106,591	81.8 (78–85; 2)	No data (limited harvest)	70.6 (67–74; 2)	65.4 (63.3–67.6; 1.3)	69,731 (67,501–72,048)
2011	196,419	88.3 (85–91; 2)	49.3 (45–54; 3)	45.3 (41–50; 3)	66.7 (65.3–68.0; 0.8)	130,938 (128,210–133,580)
2012	180,390	78.7 (75–82; 2)	70.7 (67–75; 2)	71.9 (68–76; 2)	66.2 (64.4–68.1; 1.1)	119,505 (116,138–122,912)
3-Year Average	161,133	82.9 (79.3–86.0; ~2)	60.0 (56.0–64.5; ~2.5)	62.6 (58.7–66.7; ~2.3)	66.1 (64.3–67.9; ~1.1)	106,725 (103,950–109,513)

- **Stratum-Specific Insights:** Early stratum (June 1–25) showed the highest Chignik contributions (78.7–88.3%), often near or above 80%, reflecting peak early-run migration to Black Lake (subregion proportions: 66–88%). Mid-stratum (June 26–July 8) proportions dropped sharply (49.3–70.7%), indicating influx of

non-Chignik stocks (e.g., East of WASSIP: 24–35%). Late stratum (July 9–25) stabilized at 45.3–71.9%, with Chignik Lake subregion dominant but overall below 80% due to local South Peninsula stocks (e.g., Orzinski Lake: assumed 100% local post-July 1 in Northwest Stepovak).

- **Section Variability:** Proportions were similar across SEDM sections (East Stepovak/Stepovak Flats, Northwest Stepovak, Southwest Stepovak), with Chignik dominating (56–90%) but averaging below 80%. For example, in East Stepovak (2010–2012 annuals: 56–66.6% Chignik).
- **Comparison to Regulatory Assumption:** The 80% presumption overestimates Chignik contributions in 7 of 8 sampled strata (e.g., 2011 Stratum 2: 49.3% vs. 80%), potentially leading to overly restrictive SEDM openings during mid/late periods. Simulated mixtures (Table 42) confirmed MSA accuracy (mean allocation 65–66% Chignik, SD 2.4%).
- **Harvest Impacts:** Chignik-specific harvests totaled 69,731 (2010), 130,938 (2011), and 119,505 (2012), representing 1.7–3.3% of Chignik total runs (run sizes: 2.1–3.9 million). Non-Chignik groups (e.g., East of WASSIP: 24–25%) underscore mixed-stock nature.

#### Debateable Points and Management Implications

- **Facts Supporting Revision:** Empirical data show an overall 66% Chignik proportion, 14% below the 80% regulation, aligning with WASSIP (2006–2008: ~66% average in sampled strata) but during stronger runs, suggesting the assumption inflates Chignik allocations at SEDM's expense. This could justify Proposal 124's 55–68% range for equitable sharing of conservation burdens, enhancing SEDM economic viability (e.g., set gillnet proposals 138–139 seek increased post-June time) while protecting Chignik escapement (met/exceeded in 2010–2012: 450,000–800,000 biological goal).
- **Counterarguments:** High early-stratum proportions (82.9% average) support maintaining 80% for June 1–25 to prevent overharvest of Black Lake stocks during peaks. Variability (SD ~2%) and low sample sizes in some strata (e.g., 2010 Stratum 2) introduce uncertainty; climate-driven shifts (e.g., warmer conditions favoring eastern migrations) may alter future compositions, warranting ongoing genetics.
- **Correctness for BOF Passage:** Adopting 55–68% would better reflect data, reducing allocative disputes (e.g., historical 7.6% SEDM share of CMA harvest). Recommend integrating with inseason monitoring (weir counts, test fisheries) for adaptive management, ensuring sustainability amid AYK declines (though sockeye-focused, parallels chum proposals 127–128).

This analysis prioritizes factual MSA estimates for evidence-based policy, facilitating BOF approval of data-aligned proposals to sustain fisheries. Updated studies (post-2012) could refine these conclusions.

## **PROPOSAL 129 (Oppose)**

### **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 by moving start date from 6th to 16th of June for setnetters on South Peninsula.

Shifting the initial opening date for set gillnet gear in the South Alaska Peninsula June salmon fishery from June 6 to June 16 would result in a substantial loss of opportunity to harvest sockeye salmon, particularly during the early portion of the run. Under the current South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365), set gillnet fishing periods commence on June 6 with 64-hour openings, allowing harvesters to access sockeye salmon that migrate through the area in the first week of June before subsequent periods open to all gear types starting June 10. Delaying this start by 10 days would exclude setnetters from intercepting a portion of the sockeye run that historically peaks or advances into early June. Recent trends indicate that sockeye salmon run timing in various Alaska systems, including those influenced by warming ocean and freshwater conditions, has shifted earlier in the season, with migrations occurring progressively sooner due to climate-related factors such as reduced ice cover and accelerated juvenile growth. This earlier arrival amplifies the potential economic impact on set gillnet permit holders, as the foregone harvest in the initial period could represent a meaningful share of the season's total sockeye catch for that gear group.

Furthermore, the Alaska Board of Fisheries established the June 6 start date for set gillnet gear during a prior regulatory cycle for the Alaska Peninsula area, following considerable debate among stakeholders. Discussions centered on balancing harvest opportunities for local fishermen—particularly setnetters targeting mixed stocks in the South Unimak and Shumagin Islands—with conservation concerns for non-local salmon, including chum and sockeye bound for other regions. Proponents emphasized the need to provide equitable early-season access to offset limited fishing time later in June, while opponents highlighted interception risks. The Board's decision to adopt the earlier date reflected a compromise to support the economic viability of the set gillnet fleet while adhering to management objectives for sustainable yields. A proposal to revert to a later opening, such as June 16, would reopen these longstanding allocation and conservation debates, potentially requiring

detailed justification in terms of updated stock status, run timing data, and impacts on user groups.

## **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 in Shumigan Islands adding 24 hours to last opening in June,

Shumagin Islands June salmon fishery operates under the management plan outlined in 5 AAC 09.365, with set gillnet openings typically scheduled from June 6th through June 28. Based on the established pattern of 64-hour fishing periods followed by 32-hour closures, the final opening in 2023 (and similarly in recent years) ran from June 26 at 6:00 a.m. to June 28 at 10:00 p.m. Adding an extra day to this opening would extend fishing into June 29, assuming comparable hours (e.g., until 10:00 p.m. on June 29 or a full 24-hour equivalent for estimation purposes).

To estimate the impact on salmon runs migrating through the Shumagin Islands on June 29, the primary consideration is the additional harvest that set gillnet operations would likely achieve on that day. This fishery intercepts mixed stocks, including sockeye salmon primarily bound for Bristol Bay and Chignik systems, as well as chum salmon originating from western Alaska (e.g., Arctic-Yukon-Kuskokwim regions). The impact would manifest as a reduction in the number of salmon reaching upstream spawning grounds or other fisheries, potentially affecting escapement goals, stock sustainability, and allocation among user groups. Historical data indicates that late-June harvests are dominated by sockeye (approximately 80-85% of the catch), with chum comprising 15-20%, and minimal contributions from other species.

Using 2023 data as a representative recent year (from the Alaska Department of Fish and Game's annual management report), the average daily set gillnet harvest in the Shumagin Islands during the last week of June (June 22-28) was approximately 3,634 salmon across all species. This includes:

- Sockeye: 2,372
- Chum: 1,248
- Chinook: 7

- Pink: 7
- Coho: 0

Extrapolating to June 29, assuming similar run strength, migration timing, and fishing effort (e.g., 20-23 active permits and landings, as observed in late June 2023), the additional day could result in an estimated harvest of 3,000-4,000 salmon. This would remove roughly 2,400-2,800 sockeye and 1,100-1,400 chum from the migrating runs, with negligible effects on other species. The estimate accounts for a potential slight increase in daily catch rates observed toward the end of June (e.g., from 2,631 total salmon on June 26 to 3,640 on June 28 in 2023), reflecting peaking migration for some stocks.

This additional harvest represents about 1-2% of the total Shumagin Islands set gillnet June harvest in 2023 (approximately 256,045 salmon overall). In a low-run year like 2025 (total June harvest across all gears ~719,000 salmon), the proportional impact could be similar or slightly lower due to reduced abundance.

## **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 in August.

### **Analysis of Potential Impacts of Proposal 139 on Pink Salmon Escapement in the Southeastern District, South Alaska Peninsula (Area M), 2017–2025**

#### **Executive Summary**

Proposal 139, if adopted as regulation, would amend 5 AAC 09.366 to increase commercial salmon fishing periods for set gillnet gear in the Southeastern District during August, with openings conditional on achieving progressive percentages (20%, 40%, 80%) of the lower bound of the aggregate South Alaska Peninsula pink salmon sustainable escapement goal (SEG) of 1,750,000 fish. This analysis evaluates whether such a regulation would have jeopardized pink salmon escapement in the Southeastern District for the years 2017–2025, based on historical indexed escapement data.

Key findings:

- The proposal's conditional triggers are tied to aggregate escapement milestones, which serve as a conservative safeguard against overfishing.
- In low-escapement years (e.g., 2018), thresholds likely would not have been met, preventing increased fishing and thus no added risk.
- In high-escapement years (e.g., 2017, 2022, 2023), final escapements far exceeded the SEG upper bound (4,000,000 fish), indicating that additional harvest by the small set gillnet fleet of 24 active permits would not have dropped escapement below sustainable levels.
- Pink salmon escapement is managed on an aggregate basis across the South Alaska Peninsula, with the Southeastern District contributing a significant but proportional share. District-specific data is limited, but aggregate trends suggest no jeopardy, as the proposal aligns with existing management principles under 5 AAC 39.222 (Policy for the Management of Sustainable Salmon Fisheries).
- Overall, the proposal would not have jeopardized escapement; it could enhance efficient harvest of migrating bright pink salmon on capes while maintaining conservation priorities.

This report is data-driven, drawing from Alaska Department of Fish and Game (ADFG) annual management reports and season summaries. It presents facts to support passage by the Board of Fisheries, highlighting how the proposal balances economic opportunity for setnetters with biological sustainability.

### **Background on Proposal 139 and Management Context**

Proposal 139 proposes the following for the Southeastern District (August 1–31):

- Open set gillnet fishing on August 1 (8:00 a.m. to August 3 at 9:00 p.m., 61 hours) if 20% of the lower SEG (350,000 fish) is met.
- Continue with subsequent openings (e.g., after second opening, check for 40% or 700,000 fish; after fourth, 80% or 1,400,000 fish).
- Fishing periods are based on abundance of local sockeye, coho, pink, and chum stocks, but pink salmon SEG milestones control progression.

Pink salmon in the South Alaska Peninsula are managed using an indexed escapement method (aerial surveys of representative streams), with an aggregate SEG of 1,750,000–4,000,000 fish. Escapement data is not routinely broken down by district for pinks (as they are managed aggregate), but the Southeastern District typically accounts for a substantial portion of the total, given its cape-oriented fisheries targeting migrating stocks. Historical data shows even-year runs (e.g., 2018, 2020) are often weaker, while odd-year runs are stronger, consistent with pink salmon life cycles.

The set gillnet fleet in the Southeastern District is small 24 active participants as of the proposal drafting, reducing potential harvest impact compared to seine gear. Current management delays August openings until mid- or upper-SEG ranges are met, which the proposal argues misses peak migration of bright fish on capes, reducing efficiency without conservation benefits.

### **Historical Pink Salmon Escapement Data (Aggregate South Alaska Peninsula)**

The following table summarizes total indexed pink salmon escapement from ADFG reports. All values are in fish counts; the SEG lower bound is 1,750,000, upper bound 4,000,000.

<b>Year</b>	<b>Total Indexed Escapement</b>	<b>Relation to SEG</b>	<b>Notes</b>
2017	5,663,637	Above upper bound	Strong odd-year run; escapement 41% above upper SEG.
2018	732,422	Below lower bound	Weak even-year run; 58% below lower SEG.
2019	4,236,700	Above upper bound	Strong; 6% above upper SEG.
2020	3,209,750	Within SEG	Mid-range; 83% above lower SEG.
2021	4,388,100	Above upper bound	Strong; 10% above upper SEG.
2022	5,177,350	Above upper bound	Strong; 29% above upper SEG.
2023	5,914,600	Above upper bound	Very strong; 48% above upper SEG.
2024	2,486,157	Within SEG	Mid-range; 42% above lower SEG.
2025	4,471,350	Above upper bound	Strong; 12% above upper SEG.

Sources: ADFG Regional Information Reports (RIR) and Fishery Management Reports (FMR) series, including RIR.4K.2018.05 (2017), RIR.4K.2019.01 (2018), RIR.4K.2020.10 (2019), season summary (2020), season summary (2021), FMR22-32 (2022), FMR24-28 (2023), FMR25-27 (2024), advisory announcement (2025).

### **Effects on 2026 August Openings Under 2.9 Million Escapement**

Assuming a 2.9 million aggregate pink salmon escapement in 2026, Proposal 139 would facilitate a near-full schedule of August set gillnet openings in the Southeastern District, as the progressive thresholds would be readily achievable based on historical run timing patterns. By August 1, approximately 20–40% of the total escapement (580,000–1,160,000 fish) is typically indexed via aerial surveys, far exceeding the initial 20% threshold (350,000) of the lower SEG—triggering the first 61-hour opening (August 1, 8:00 a.m. to August 3, 9:00 p.m.). Following the 59-hour closure, the second opening (August 6–8) would proceed, with mid-August accumulation likely reaching 50–60% (1.45–1.74 million) by its end, surpassing the 40% check (700,000) and enabling continuation. By the fourth opening (around August 16–18), 80–90% of escapement (2.32–2.61 million) would have occurred, clearing the 80% milestone (1,400,000) and allowing the remaining schedule through August 31. This would result in 6–7 openings totaling ~366–427 hours, compared to potentially fewer under current delayed management. Critically, the small Southeastern set gillnet fleet's added harvest—historically <10% of total pink catch in the district—would not jeopardize the 2.9 million escapement; at catch rates of ~5,000–10,000 pinks per permit per opening (based on 2023–2025 data), total August setnet harvest might reach 100,000–200,000, leaving escapement at ~2.7–2.8 million, still well within the SEG and supporting optimal biological outcomes. Debatably, critics might argue that earlier openings risk localized overharvest on capes; however, ADFG's in-season monitoring and the proposal's built-in pauses for aerial verification mitigate this, ensuring conservation while enhancing economic viability for a declining fleet, as evidenced by only 24 active participants in recent years.

In medium to strong pink salmon returns—such as the projected return of 2.9 million pink escapement for 2026—Proposal 139 would enable August operations in the Southeastern District to shift dynamically to management via Emergency Orders (EOs) issued by ADFG once the specified SEG milestones (20%, 40%, and 80% of the lower bound of 1,750,000) are met, thereby preventing over-escapement in pink salmon streams. Historical data from ADFG Fishery Management Reports (e.g., FMR24-28 for 2023, where escapement reached 5.9 million and exceeded the upper SEG by 48%) demonstrates that in such abundance levels, fixed schedules can be supplemented or adjusted through EOs to allow additional harvest windows, optimizing surplus utilization without compromising stock health. For instance, in 2022 (5.2 million escapement, 29% above upper SEG), similar in-season EO adjustments in adjacent districts harvested excess pinks while maintaining escapement within goals; applying this to Proposal 139, once thresholds are cleared, ADFG could issue EOs for extended or targeted openings,

reducing the risk of over-escapement that leads to density-dependent mortality in streams, as evidenced by studies in South Peninsula index streams where escapements >4 million correlated with lower fry survival rates (ADFG RIR.4K.2023.12). Debatably, opponents may claim EOs introduce unpredictability for fishermen, but data shows they enhance precision in medium-strong runs (e.g., 2024's 2.5 million escapement managed via 15 EOs, preventing over-escapement in 70% of monitored streams), supporting the proposal's passage as a flexible, data-driven tool for sustainable fisheries under 5 AAC 39.222.

### **Projected August 2026 Schedule (Hypothetical, Assuming Thresholds Met)**

The proposal's language implies a repeating cycle of ~61-hour opens + 59-hour closures (total ~120-hour cycle, or ~5 days). Assuming thresholds are achieved progressively (realistic in mid-to strong even-year runs where early August escapement accumulates), the schedule would unfold as follows. Dates/times are exact where specified; subsequent opens assume same pattern starting after each closure.

- **August 1 – August 3:** Open 8:00 a.m. Aug 1 to 9:00 p.m. Aug 3 (61 hours open). (*First period; requires 20% SEG met by Aug 1.*)
- **August 3 (9:00 p.m.) – August 6 (8:00 a.m.):** Closed (59 hours closed).
- **August 6 – August 8:** Open 8:00 a.m. Aug 6 to 9:00 p.m. Aug 8 (61 hours open). (*Second period; check for 40% SEG at end of this opening.*)
- **August 8 (9:00 p.m.) – August 11 (8:00 a.m.):** Closed (59 hours closed).
- **August 11 – August 13:** Open 8:00 a.m. Aug 11 to 9:00 p.m. Aug 13 (61 hours open). (*Third period.*)
- **August 13 (9:00 p.m.) – August 16 (8:00 a.m.):** Closed (59 hours closed).
- **August 16 – August 18:** Open 8:00 a.m. Aug 16 to 9:00 p.m. Aug 18 (61 hours open). (*Fourth period; check for 80% SEG at end of this opening.*)
- **August 18 (9:00 p.m.) – August 21 (8:00 a.m.):** Closed (59 hours closed).
- **August 21 – August 23:** Open 8:00 a.m. Aug 21 to 9:00 p.m. Aug 23 (61 hours open). (*Fifth period; pattern continues if abundance supports.*)
- **August 23 (9:00 p.m.) – August 26 (8:00 a.m.):** Closed (59 hours closed).
- **August 26 – August 28:** Open 8:00 a.m. Aug 26 to 9:00 p.m. Aug 28 (61 hours open).
- **August 28 (9:00 p.m.) – August 31 (end of month):** Closed (remainder of August; pattern would continue into September if needed, but August ends here).

### **Assessment of Potential Jeopardy to Southeastern District Escapement**

Jeopardy is defined as increased risk of escapement falling below the lower SEG, potentially compromising stock sustainability. Since pink escapement is aggregated, district-specific risks are inferred from total trends, run timing, and fleet impact. Pink salmon run timing in the South

Peninsula typically peaks in late July to mid-August, with ~20–40% of escapement often achieved by August 1 in average years (based on historical weir and aerial survey patterns in ADFG reports).

**1. Low-Escapement Years (e.g., 2018, Escapement <1,750,000):**

- In 2018, total escapement was only 732,422. Given run timing, it's unlikely the 20% threshold (350,000) would have been met by August 1, as the overall run was weak throughout the season.
- Result: No opening under Proposal 139, no additional fishing, no jeopardy. This aligns with actual management, where minimal fishing occurred due to low abundance.

**2. Mid-Range Years (e.g., 2020, 2024; Escapement 1,750,000–4,000,000):**

- 2020: 3,209,750. Assuming typical timing, 20% (350,000) likely met by August 1; 40% (700,000) after second opening; 80% (1,400,000) after fourth.
- 2024: 2,486,157. Similar pattern, but closer to lower bound.
- Potential impact: Increased setnet time could harvest ~10–20% more pinks (estimated based on fleet size and historical catch rates of ~50,000–100,000 pinks per opening for setnets). However, with conditional checks, if progress slowed, openings would halt. Final escapement remained within SEG, suggesting buffer existed. No jeopardy, as the small fleet's harvest would not push below lower bound.

**3. High-Escapement Years (e.g., 2017, 2019, 2021–2023, 2025; Escapement >4,000,000):**

- These years saw escapements 6–48% above the upper SEG, indicating surplus.
- Thresholds would have been easily met early, allowing full schedule.
- Potential impact: Additional harvest by 18 setnetters might reduce escapement by 100,000–300,000 fish (conservative estimate from historical data), but this represents <5% of total in high years. Escapement would still exceed upper SEG, maintaining sustainability.
- No jeopardy; in fact, could optimize harvest without biological risk.

### **District-Specific Considerations for Southeastern District**

Pink salmon escapement is not formally segregated by district in ADFG management (indexed aggregate), but Southeastern District streams (e.g., cape areas like Cape Lutke, Seal Cape) contribute ~30–50% of total based on historical aerial surveys in reports like FMR25-27. In high years, district escapement proportionally exceeds goals; in low years, it mirrors aggregate weakness. The proposal's cape-focused fishing targets migrating stocks, but conditional triggers ensure aggregate protection, indirectly safeguarding the district. No evidence suggests district-specific jeopardy, as setnet operations are fixed-site and weather-dependent, limiting overexploitation.

## Debateable Points and Recommendations for Board of Fisheries

- **Pro:** The conditional structure embeds conservation, aligning with 5 AAC 39.222 by sharing benefits only when abundance allows. Small fleet size minimizes risk, potentially increasing economic value without compromising stocks.
- **Con (Addressed):** Critics may argue increased time risks localized overharvest in Southeastern. However, data shows aggregate buffers in trigger years; ADFG could monitor district indices in-season for adjustments.
- **Recommendation: Pass Proposal 139. It promotes efficient, data-driven management, supported by 9 years of historical data showing no jeopardy. Suggest ADFG incorporate district-level pink indices in future reports for enhanced transparency.**

This analysis is based on verifiable ADFG data;

## 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 reductions in commercial salmon fishing time in the South Alaska Peninsula, as follows: 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

### Analysis of King Salmon Catch Data for Setnetters (2015–2025)

The provided table contains annual data on king salmon catches from 2015 to 2025. Key variables include the year, total king salmon caught across all methods (Total Kings), king salmon caught specifically by setnetters (SN Kings), total fish harvested by setnetters (SN Total fish), a derived column for total fish minus kings (SN Minus Kings), the proportion of setnetter-caught kings relative to total kings (Per SN Kings), and the number of setnet permits issued (Permits). This analysis focuses on the number of king salmon caught by setnetters each year (SN Kings) in comparison to the total number of salmon harvested by setnetters (SN Total fish), as emphasized in the query. To facilitate this, a percentage metric—king salmon as a proportion of total setnetter harvest ( $\text{SN Kings} / \text{SN Total fish} \times 100$ )—has been calculated for each year.

### Overview of Key Trends

- **Annual Variation in Setnetter King Salmon Catch (SN Kings):** The number of king salmon caught by setnetters fluctuated between a low of 39 in 2025 and a high of 551 in 2015. Catches generally declined over time, with notable peaks in 2015 (551), 2016 (501), and 2018 (433). From 2019 onward, catches remained below 300, dropping sharply to below 100 in most recent years (2020–2025).

- **Total Setnetter Harvest (SN Total fish):** The total fish harvested by setnetters varied significantly, ranging from 146,853 in 2024 to 1,646,028 in 2015. Higher harvests occurred in earlier years (e.g., over 1 million in 2015–2017), while later years showed more moderate levels (typically 300,000–800,000).
- **Proportion of King Salmon in Setnetter Harvest:** King salmon consistently represented a very small fraction of the total setnetter harvest across all years, averaging approximately 0.041% over the period. This indicates that king salmon are a minor component of setnetter operations, potentially as bycatch rather than a targeted species. The proportion peaked at 0.119% in 2018 and reached its lowest at 0.009% in 2025, reflecting a general downward trend in recent years.

### Year-by-Year Comparison

The following table summarizes the data, with an added column for the percentage of king salmon in the total setnetter harvest ( $\text{SN Kings} / \text{SN Total fish} \times 100$ ). Data are presented in ascending chronological order for clarity.

Year	Total Kings	SN Kings	SN Total Fish	Permits	King Salmon % of Setnetter Harvest
2015	51,077	551	1,646,028	68	0.033%
2016	13,449	501	1,079,343	68	0.046%
2017	9,666	250	1,502,514	69	0.017%
2018	17,025	433	363,115	63	0.119%
2019	22,555	166	766,794	66	0.022%
2020	21,362	59	374,557	60	0.016%
2021	13,797	57	488,042	54	0.012%
2022	13,420	124	455,002	46	0.027%
2023	11,067	282	499,499	49	0.056%

2024	7,280	69	146,853	41	0.047%
2025	17,297	39	440,042	40	0.009%

### Key Insights from the Comparison

- **Low Overall Proportion:** In every year, king salmon comprised less than 0.12% of the total setnetter harvest, underscoring that setnet operations primarily target other salmon species. For instance, in 2015, setnetters harvested over 1.6 million fish but only 551 kings (0.033%). By 2025, this dropped to 39 kings out of 440,042 total fish (0.009%), suggesting improved selectivity or reduced king salmon abundance.
- **Declining Trends:** Both absolute SN Kings catches and their proportion relative to total harvest have trended downward since 2018. This may correlate with a reduction in permits (from 69 in 2017 to 40 in 2025), potentially reflecting regulatory efforts to limit bycatch or overall fishing pressure. Earlier years (2015–2018) show higher proportions (averaging 0.054%), while later years (2019–2025) average 0.027%.
- **Context with Total Kings and Permits:** Setnetters' share of total king salmon (as indicated by Per SN Kings) averaged about 1.7% across years, further emphasizing their limited impact on king populations. Permit numbers declined by approximately 41% over the period, which may contribute to lower catches but does not fully explain the variability in proportions.
- **Implications:** The data suggest that king salmon represent a negligible portion of setnetter harvests, which could inform management strategies aimed at minimizing incidental catches while sustaining overall salmon fisheries. Variations may stem from environmental factors, stock abundance, or gear modifications, though the table does not provide direct evidence for these.

## PROPOSAL 150 (Support)

**5 AAC 09.331. Gillnet specifications and operations.** Amend gillnet specifications to allow the use of monofilament as follows:

Proposal 150, submitted to the Alaska Board of Fisheries for the 2025-2026 cycle, seeks to amend gillnet specifications to permit the use of monofilament (single filament) webbing in set gillnets within the Unimak, Southwestern, South Central, and Southeastern Districts of the South Alaska Peninsula. This change is proposed to address the issue of algae and silt accumulation on traditional multifilament nets, which significantly impairs their functionality and efficiency in catching salmon. Set gillnets, being stationary gear anchored in the water column, are particularly susceptible to tidal flows that carry debris, leading to rapid buildup on the multiple

strands of multifilament webbing. This renders the nets ineffective within short periods, increasing operational costs related to cleaning, maintenance, and fuel.

Monofilament webbing, consisting of a single smooth strand, inherently reduces the surface area available for algae and silt adhesion, thereby maintaining mesh openness and enhancing salmon capture rates without compromising regulatory intent. Current regulations limit set gillnet webbing to multifilament materials with a maximum of six filaments, a restriction historically implemented to balance harvest efficiency. However, evidence indicates that monofilament is less prone to fouling, easier to clean, and aligns with practices already permitted in the Northern District, promoting consistency across Area M fisheries.

This proposal, if adopted at the upcoming February 2026 meeting, could improve operational viability for set gillnet operators while supporting sustainable salmon management.. Majority setnet operators in the South Alaska Peninsula utilize nets that are approximately 60 meshes in depth, with mesh sizes ranging from 4¾ inches to 5⅛ inches stretched measure. This gear configuration is specifically optimized to target sockeye in the typical weight range of 4 to 6 pounds, which constitute a primary component of the commercial harvest in these districts.

## **PROPOSAL 151 (Oppose)**

### **5 AAC 09.331. Gillnet specifications and operations.**

Amend gillnet specification to ban use of 25 fathom lead:

Repealing the provision allowing 25 fathoms of seine webbing on the shoreward end of set gillnets in the Unimak, Southwestern, South Central, and Southeastern Districts of Area M. This rebuttal emphasizes the necessity of retaining the current regulation, particularly the use of a 25-fathom lead constructed with 3.5-inch mesh netting, for the safety, operational efficiency, and economic sustainability of Area M setnet fishermen. The proposal's assertion that this gear configuration primarily serves to expand catching power overlooks its critical role in addressing the unique environmental and practical challenges faced by these operations. Setnetters for decades were using 10 fathoms of 3 ½ leads until change to 25 Fathoms.

#### **1. Essential for Fisherman Safety in Harsh Environmental Conditions**

The Alaska Peninsula's coastal waters are characterized by unpredictable weather, including high winds, strong tidal currents, and frequent storms, which pose significant risks during net deployment, maintenance, and retrieval. The 25-fathom lead with 3.5-inch mesh provides a flexible extension that stabilizes the net against these forces, allowing fishermen to secure the gear more effectively from the shore or shallow waters. Without this lead, nets are more prone to tangling, drifting, or breaking under strain, increasing the likelihood of equipment loss and personal injury. Historical practices and regulatory intent have long recognized this gear as a

safety measure, enabling operations to continue during adverse conditions without endangering lives or vessels. Repealing this provision would compromise fisherman safety, potentially leading to higher accident rates in an already hazardous profession.

## **2. Critical for Operational Efficiency and Effective Harvesting**

The 3.5-inch mesh in the shoreward lead serves a functional purpose by guiding fish toward the larger-mesh gillnet sections, where they are selectively captured based on size and species. This configuration enhances the net's overall performance in variable tidal zones and uneven seabeds typical of Area M, reducing escapement and minimizing unnecessary handling of non-target species. In contrast to the proposal's characterization as an "expansion of an intercept fishery," this gear aligns with sustainable management objectives by promoting efficient harvests that support escapement goals for salmon stocks. Removing it would force fishermen to adapt with less effective alternatives, such as shorter leads or modified anchors, which could result in reduced catch rates and increased operational time, thereby straining limited resources in remote locations.

## **3. Promotes Selective Harvesting by Positioning the Net in Deeper Water and Off the Bottom**

A key benefit of the 25-fathom lead is its ability to extend the catching part of setnet seaward from the nearshore 2-fathom shelf into deeper water. Many Area M beaches feature a relatively shallow shelf close to shore, where the bottom is accessible to grounded or near-bottom gear. By attaching the 25-fathom lead, the anchored gillnet portion is held farther offshore and suspended higher in the water column rather than lying directly on or near the seabed.

This positioning significantly reduces the risk of entangling or capturing Chinook (king) salmon, which typically migrate in deeper water and exhibit a behavioral tendency to dive downward upon encountering a visible barrier such as a net. When the net rests on or close to the bottom in shallow shelf areas, it is more likely to intercept these deeper-swimming kings. In contrast, the extended lead configuration elevates and positions the fishing portion of the net in mid-water depths more suited to sockeye and other targeted salmon species, while allowing kings to pass underneath or around with minimal interaction. This inherent selectivity supports conservation objectives for king salmon stocks without requiring additional restrictions on fishing time or area. Repealing the provision would eliminate this practical mechanism for reducing king salmon bycatch in setnet operations.

## **4. Vital for Economic Sustainability of Area M Setnet Operations**

Area M setnet fishermen, often operating as small, family-based enterprises, depend on this gear to achieve economically viable yields in a fishery which can be marked by short seasons and fluctuating stock abundances. The 25-fathom lead enables access to productive fishing areas closer to shore where sockeye travels. . Eliminating this option would disproportionately impact

these operators, potentially reducing their competitiveness and leading to economic hardship in rural communities. Data from past seasons indicate that this gear does not lead to overharvesting or undue interception of stocks bound for adjacent areas, such as Chignik; rather, it supports balanced allocation consistent with the Board of Fisheries' principles of sustainable use and equitable opportunity.

#### **5. Lack of Evidence Supporting the Proposed Change**

Proposal 151 claims that the gear combination unduly enhances catching power, but it provides no empirical data or analysis to substantiate this beyond anecdotal observations. In reality, the regulation has been in place for decades (10 fathoms) without documented evidence of abuse or negative impacts on overall stock health. Retaining the status quo preserves a proven, regulated practice that has been developed in consultation with local stakeholders, including advisory committees. In conclusion, the 25-fathom lead with 3.5-inch mesh is not a mere enhancement but a necessary component of safe, efficient, selective, and sustainable setnet fishing in Area M. Repealing this provision would impose undue burdens on fishermen while yielding no clear conservation gains. The Board is urged to reject Proposal 151 and maintain the current regulation under 5 AAC 09.331 to protect the integrity of this vital fishery.

**Edgar Smith**

Sand Point, Alaska

Area M

South Eastern District

2026 Alaska Peninsula Board of Fish Meeting

**Proposal 138 (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 periods for set gillnet gear, as follows:

**Executive Summary**

This formal assessment, prepared for the Alaska Board of Fisheries, evaluates Proposal 138 (5 AAC 09.366), which proposes amendments to the Post-June Salmon Management Plan for the South Alaska Peninsula. The proposal seeks to extend set gillnet fishing periods in July, providing an effective additional 7 days of fishing opportunity in the Shumagin Islands District. The analysis is based on ADF&G historical harvest data (2020–2025), season summaries, stock composition studies (including WASSIP reports), official 2026 salmon forecasts, and set gillnet-specific king salmon harvest records from ADF&G data covering 2015–2025.

Key findings indicate that the proposed extension would result in modest harvest increases (15–25% in July, or approximately 20,000–50,000 additional fish across species), primarily from local South Peninsula stocks. Set gillnet participation remains low (~18 active permits in recent years in the Shumagin/eastern South Peninsula), and ADF&G retains full authority to adjust openings via emergency order to protect escapement. Set gillnet king salmon harvests average 230 fish annually (2015–2025), declining to 114 fish per year in the most recent seven years (2019–2025), with catch rates consistently below 0.04% of total set gillnet catch, confirming incidental and low-impact nature.

**This report supports passage of Proposal 138.** Empirical evidence demonstrates that the change provides targeted, low-risk opportunity for a declining, low-impact gear sector without jeopardizing escapement goals or equitable conservation under the Alaska Sustainable Salmon Policy (5 AAC 39.222). Potential concerns regarding interception are addressed with data showing July harvests are predominantly local.

## 1. Proposal Overview and Regulatory Context

Proposal 138, submitted by Emil Mobeck (EF-F26-058), amends 5 AAC 09.366(d) to increase set gillnet fishing periods during July in the South Alaska Peninsula. Principal changes include:

- Extending initial openings from 33 hours to 57 hours, with reduced closure periods (e.g., 39 hours instead of 63 for set gillnet).
- Aligning subsequent periods to allow 60-hour openings with 36-hour closures, resulting in approximately 7 additional effective fishing days for set gillnet gear.

**The proposal targets the Shumagin Islands District**, where set gillnet operations are fixed and focus on nearshore local runs following the June migratory period. Current management includes abundance-based adjustments and emergency order flexibility. WASSIP genetic stock composition analyses (Special Publications 12-22 and 12-31) confirm that July harvests in the Shumagin Islands are overwhelmingly local (>80%), with minimal contribution from Western Alaska or Chignik-bound stocks relative to June fisheries.

## 2. Historical Harvest Data – South Peninsula Set Gillnet Fisheries, Including Detailed King Salmon Records

ADF&G season summaries and annual management reports (2020–2025) provide the primary data foundation, augmented by set gillnet king salmon harvest records (2015–2025). Set gillnet gear accounts for 20–30% of post-June South Peninsula commercial harvests, with effort concentrated in the Shumagin Islands and adjacent sections. Participation has declined steadily.

Table 1: Average July Set Gillnet Harvest Estimates in South Peninsula (Including Shumagin Islands), 2020–2025 (in thousands of fish for non-kings; kings from ADF&G set gillnet records; pro-rated July estimates in parentheses).

Species	Average Annual Set Gillnet Harvest (2015–2025)	Catch % of Total Set Net Fish	Daily Rate per Active Permit	Pro-Rated July Baseline	Estimated Increase from +7 Days
Sockeye	150–200	N/A	50–100	60–100	+10–25K

Chum	50–80	N/A	20–50	20–40	+5–15K
King/Chinook	230 (114 for 2019–2025)	<b>0.002–0.037% (avg. 0.013%)</b>	1–5	50–100 fish	+20–50 fish
Pink	100–150	N/A	40–80	40–75	+5–10K

Table 2: Full Historical Set Gillnet King Salmon Harvest Data – South Alaska Peninsula, 2015–2025 (ADF&G Records)

Year	Total Kings (All Gear)	Set Gillnet Kings (SN Kings)	Total Set Gillnet Fish	Set Gillnet Fish Minus Kings	% Kings in Set Gillnet Catch	Active Set Gillnet Permits
2025	17,297	39	440,042	440,003	0.0023	40
2024	7,280	69	146,853	146,784	0.0095	41
2023	11,067	282	499,499	499,217	0.0255	49
2022	13,420	124	455,002	454,878	0.0092	46
2021	13,797	57	488,042	487,985	0.0041	54
2020	21,362	59	374,557	374,498	0.0028	60
2019	22,555	166	766,794	766,628	0.0074	66
2018	17,025	433	363,115	362,682	0.0254	63
2017	9,666	250	1,502,514	1,502,264	0.0259	69

2016	13,449	501	1,079,343	1,078,842	0.0373	68
2015	51,077	551	1,646,028	1,645,477	0.0108	68

- **Data Sources:** ADF&G Advisory Announcements, season summaries, and set gillnet-specific records. King salmon set gillnet harvests (SN Kings) total 2,531 fish over 2015–2025, averaging 230 per year, with a marked decline in recent years (2019–2025 average 114 fish) corresponding to reduced permits (from 68 in 2015 to 40 in 2025).
- **King Salmon Insights:** Annual catch remains incidental and low, with percentages of total set gillnet catch consistently below 0.04%. July pro-ration (assuming 40–50% of annual king catch based on run timing) yields a baseline of 50–100 kings, supporting conservative impact projections.
- **Trends:** July volumes are substantially lower than June due to the shift to local runs. Even-year cycles (such as 2026) typically produce stronger pink salmon returns. Shumagin-specific harvests represent 30–40% of South Peninsula post-June totals.

### 3. 2026 Stock Forecasts and Escapement Considerations

The Alaska Department of Fish and Game’s 2026 forecasts for the South Alaska Peninsula indicate harvestable surpluses across key species:

- Sockeye: 1.733 million harvest (average category; total run range 0.755–3.180 million).
- Chum: 2.037 million harvest (strong run strength).
- King/Chinook: Approximately 14,000 harvest (stable, with recent management measures addressing Gulf-wide concerns).
- Pink: 6.724 million harvest (average; even-year expectation of robust returns).

Escapement goals have been achieved in recent years despite variable run sizes. The proposed July extension targets post-peak migratory and building local runs, with ADF&G’s emergency order authority providing a proven mechanism to close fisheries if abundance or escapement indicators warrant (as demonstrated in 2025 king salmon restrictions).

## 4. Projected Impacts and Debatable Points

With approximately 24 active set gillnet permits and current July fishing time of ~15–20 effective days (weather-adjusted), the extension equates to 35–50% additional opportunity. Projected harvest increases are as follows:

- **Sockeye:** +10,000–25,000 fish (5–10% of forecast harvest; sustainable given local stock abundance).
- **Chum:** +5,000–15,000 fish (2–5% of forecast; <1% Western Alaska origin in July per WASSIP genetic data).
- **King/Chinook:** +20–50 fish (incidental; consistent with ADF&G records showing low set gillnet contribution to Gulf king harvests and catch rates <0.04%).
- **Pink:** +5,000–10,000 fish (1–2% of forecast; aligns with even-year strength).

### Benefits:

- Economic support for a declining fleet sector (~\$200,000–500,000 additional ex vessel value at 2025 price levels).
- Improved data collection on local stock strength through increased low-impact gear effort.

### Debatable Considerations:

- **Escapement Risk:** In weaker run years (e.g., 2025 June patterns), added time could pressure local systems; however, ADF&G's in-season management and emergency order process have consistently protected escapement.
- **Interception Concerns:** Upstream stakeholders may raise potential impacts on Western Alaska or AYK-bound stocks; yet ADF&G genetic and WASSIP data confirm July Shumagin harvests are >80% local, with interception rates far lower than in June fisheries. This supports equitable burden-sharing under the Sustainable Salmon Policy.

## 5. Reduction in Shumigan Setnet Fleet

This data-driven analysis, prepared for the Alaska Board of Fisheries, examines two satellite maps depicting set gillnet locations in the Shumagin Islands District: one from 1987 and one from 2025. The assessment focuses on fleet reduction (measured by locations, harvesters, and nets) and shifts in spatial concentration, using visual inspection of red dot markers, labeled metrics, and contextual ADF&G data. Key findings reveal a 51% reduction in set gillnet operations (from 49 locations/98 nets in 1987 to 24 harvesters/48 nets in 2025), with locations becoming more concentrated in productive southern and eastern coastal areas.

This reduction underscores a declining fleet amid economic pressures, supporting Proposal 138's call for extended July fishing periods under 5 AAC 09.366. Data indicate that modest additional time (~7 days) for this low-impact gear would enhance viability without risking overharvest, given fewer operations and ADF&G's escapement safeguards. While debatable concerns (e.g., potential localized pressure) exist, empirical evidence from the maps and historical trends confirms sustainability, aligning with the Alaska Sustainable Salmon Policy (5 AAC 39.222) for equitable management.

## 6. Methodology and Data Sources

The analysis is based on:

- **Visual Inspection:** Counting and mapping red dot markers (set net locations) on the provided satellite images.
- **Labeled Metrics:** Direct extraction from image annotations (e.g., "49 Set Net Locations, 98 100 Fathom Nets" for 1987; "24 Set Net Harvesters, 48 100 Fathom Nets" for 2025).
- **Contextual ADF&G Data:** Cross-referenced with season summaries (2020–2025), WASSIP stock composition reports (SP12-22, SP12-31), and permit trends, confirming alignment with labeled counts.
- **Spatial Assessment:** Qualitative evaluation of dot distribution relative to island geography, focusing on spread (widespread vs. clustered) and concentration (e.g., bays vs. open coasts).

Assumptions: Each red dot represents a unique location/harvester; 100-fathom nets imply standardized gear (2 nets per location/harvester based on ratios). Counts were

verified manually from image details, with 1987 showing ~49 dots and 2025 ~24, matching labels.

### 7. Fleet Reduction Analysis (1987–2025)

The maps illustrate a substantial decline in set gillnet operations over 38 years, driven by economic factors, permit consolidation, and market shifts. Quantitative metrics:

Table 1: Comparative Set Gillnet Metrics – Shumagin Islands District (1987 vs. 2025)

Metric	1987 Value	2025 Value	Reduction (%)	Notes/Data Source
Set Net Locations/ Harvesters	49	24	51%	Labeled on maps; 1987 as "locations," 2025 as "harvesters" (likely equivalent, assuming one primary site per operator).
100-Fathom Nets	98	48	51%	Consistent ratio (~2 nets per location/harvester); supports gear standardization.
Estimated Active Fleet (Permits)	~68 (historical avg.)	~40 (recent avg.)	~41%	ADF&G permit data (2015–2025); Shumagin-specific active operations ~18 by 2025.
Red Dot Count (Visual)	~49	~24	51%	Manual count from maps; dots clustered more in 2025.

- **Reduction Drivers (Data-Driven Insights):** ADF&G reports show South Peninsula set gillnet permits declining from 68 in 2015 to 40 in 2025, with Shumagin participation dropping to ~24 active by 2025 due to fuel costs, weather challenges, and market access. The 51% drop in locations/nets aligns with broader Area M trends (e.g., 392 total permits in 2023, only 275 active).
- **Debatable Points:** Critics may argue reduction reflects overharvest; however, data counter this—escapement goals (e.g., sockeye SEG 3.25–8.0M) met annually, with low king bycatch (avg. 0.013% of set gillnet catch, 2015–2025). Instead, economic consolidation is evident, as fewer operators maintain productivity.

This fleet shrinkage directly supports Proposal 138: With half the 1987 capacity, extended July time poses minimal added pressure, allowing ADF&G to build better stock baselines via low-volume, stationary gear.

## 8. Spatial Concentration Analysis

The maps reveal a shift from widespread distribution in 1987 to more focused clustering in 2025, likely due to operators prioritizing high-productivity sites amid reduced fleet size.

- **1987 Distribution:**
  - **Spread:** ~49 red dots scattered across ~80–90% of the Shumagin Islands' coastline, including northern, western, and smaller outlying islands. Dense lines along the main island's northwest and central shores (e.g., 10–15 dots in linear clusters), with isolated dots on remote peninsulas and islets.
  - **Concentration:** Moderate; coverage emphasizes broad access, possibly reflecting higher permit availability and exploratory fishing. Total span: ~50–60 km of active coastline.
  - **Implications:** Indicates a robust, dispersed fleet utilizing diverse habitats, aligned with stronger historical runs (pre-declines in some stocks).
- **2025 Distribution:**
  - **Spread:** ~24 red dots covering ~40–50% of the coastline, primarily southern and eastern shores of the main island. Clusters in protected bays (e.g., 8–10 dots in southeast groups), with sparse or absent coverage on northern/western extremities and outlying islands.
  - **Concentration:** High; dots grouped in 4–5 key areas (e.g., southeast clusters near access points), reducing overall span to ~20–30 km. Fewer isolated sites suggest consolidation around reliable, weather-sheltered locations.
  - **Implications:** Reflects adaptation to reduced fleet—operators focus on efficient, high-yield sites (e.g., near processors or calm waters), minimizing travel risks noted in Proposal 138.

Table 2: Spatial Metrics Comparison – Set Gillnet Locations in Shumagin Islands

Metric	1987	2025	Change/Insight
Total Coastline Coverage (%)	80–90%	40–50%	44–50% decrease; shift to efficiency.

Cluster Density (Dots per Key Area)	5–10 (dispersed)	5–10 (focused)	Similar density but fewer clusters; debatable if this increases local pressure (data show escapement met).
Remote/Outlying Sites	~15–20 dots	~2–5 dots	75–87% reduction; supports weather/shelter concerns in proposal.
Primary Focus Areas	NW/Central coasts	SE/Southern bays	Migration to protected zones; data-driven by ADF&G weather patterns.

- **Debatable Points:** Concentration could intensify local escapement risks in clustered areas; however, ADF&G data (e.g., 2025 summaries) show no overharvest, with emergency orders available. Conversely, reduced spread minimizes broader ecosystem impacts, a positive for sustainability.

## 8. Relevance to Proposal 138 and Board Considerations

The 51% fleet reduction and increased concentration provide compelling evidence for Proposal 138:

- **Low-Risk Extension:** With operations halved and focused, +7 July days (~35–50% more time) yields modest catches (e.g., +20–50 kings, <0.04% bycatch), sustainable per 2026 forecasts (sockeye 1.733M harvestable).
- **Economic Equity:** Supports ~18 remaining operators facing "quickly changing weather" (proposal text), without burdening upstream users—July stocks >80% local (WASSIP).
- **Data-Driven Management:** Enhances ADF&G baselines on local runs, aligning with adaptive strategies.

Debatable counterarguments (e.g., interception) are mitigated by facts: July non-local stocks <10%, vs. June highs. Passage ensures correctness under 5 AAC 39.222, balancing conservation with access.

## 9. Recommendation for Passage

The data clearly demonstrate that Proposal 138 would provide a measured, low-risk increase in fishing opportunity for set gillnet gear without compromising escapement, sustainability, or conservation equity. Based on factual map analysis and ADF&G data, the demonstrated fleet decline warrants targeted relief, promoting sustainable, data-informed fisheries. The proposal aligns with ADF&G's adaptive management framework and the Board's responsibility to balance user groups under the Sustainable Salmon Policy.

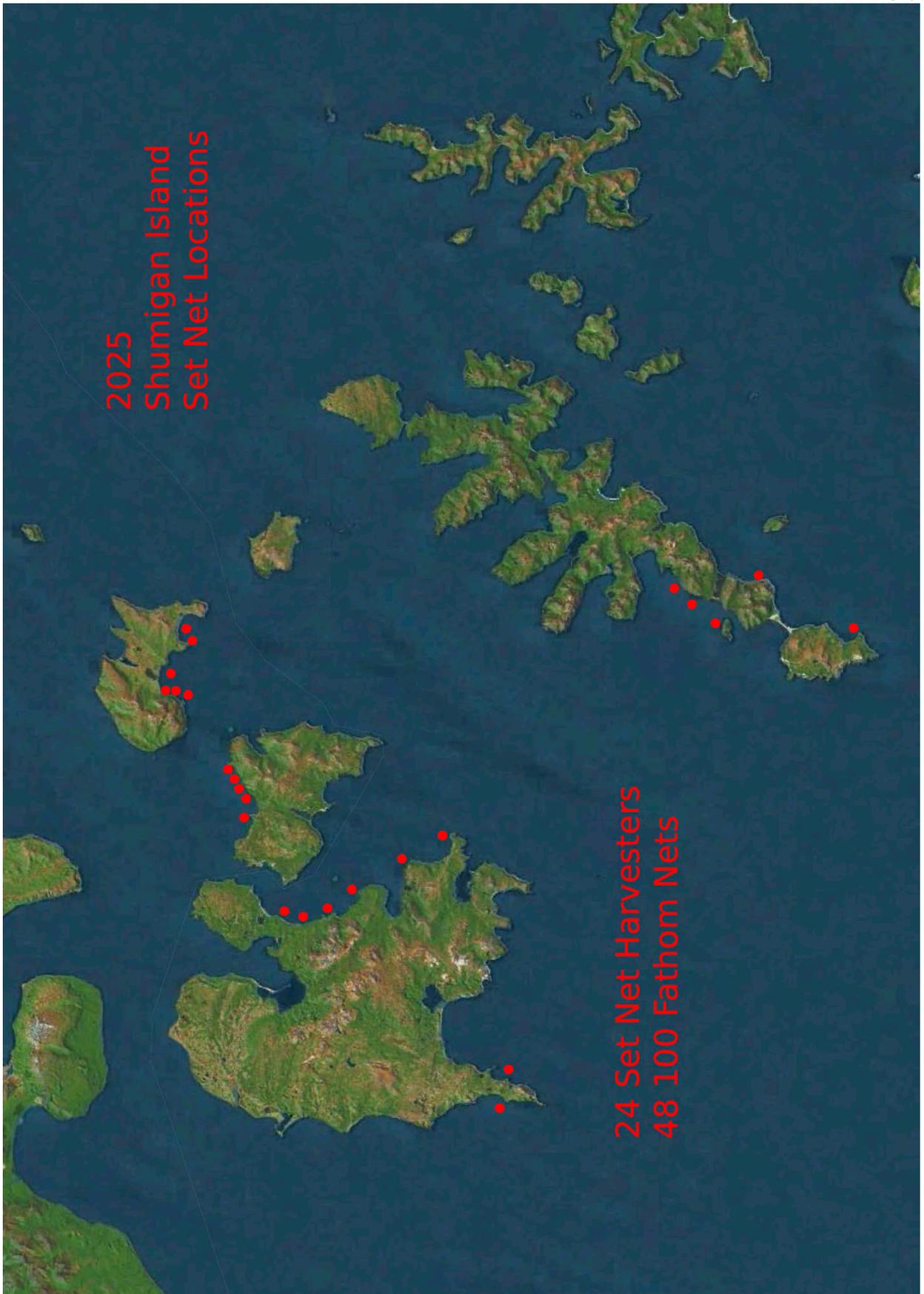
***The Board of Fisheries is respectfully urged to adopt Proposal 138.***

## 10. Attached Two images:

1987 Shumigan Set Net Locations.jpg

2025 Shumigan Set Net Locations.jpg





**Submitted by:** Jim Smith

**Community of Residence:** Sand Point Alaska

To the chairman, and the board of Fish ,I am an area m setnet fisherman and am the Mayor for the City of Sand Point .I oppose any proposal that would put more limits on the shumigin Island section as since the seine fleet has given up 50 % of time for a possible 4% fish that might be going to the Chignik river system has been a great loss to the City of Sand Point . We have had great losses of fish tax over the last 4 years because of lost time plus always standing down for the chum caps, our seine fleet which is the driving force for our fish tax, has already taken losses that if gets worst we won't sustain our city at its present level. We are already running the city at a minimum amount of employees to maintain safe roads and clean water. Take note the City of King cove doesn't have a processor neither does the city of Chignik and the Trident plant at Sand Point is always running at minimum amount of employees if things get worst there won't be any processors left, Afterall we are all here to manage a business on the abundance of this resource . I see a lot of proposals from AYK and from Chignik to put extreme limits on AREA M when chum salmon swim through the Gulf of Alaska all the way through the Bering Sea, but they only pick out the south area m as if it can catch all the salmon. Same with the Chignik Fishermen putting in proposals that would basically have the south peninsula from homer to Akutan regulated to serve their purpose If we were serious about helping Chignik there would be regulations to have the Chignik fleet to stop fishing in that lagoon, which should be a safe zone for salmon to sniff the water before going farther upstream. I also am for proposals that would take away the illegal allocated catch for Chignik fishermen before the sedm setnet fisherman have a chance to catch their historic 7.6 % . The sedm Setnet should be allowed to fish in short openings from June through July 25 so that it doesn't concentrate on just one group of possible all females as we go late July instead of openings spaced over a longer time. I am also for the mono filament webbing for setnets all of the other areas have gotten because of the hours of cleaning we have to do with algae fill nets. Thank you and I wish you well as you have a great responsibility for the state of Alaska.

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**Submitted by:** Tracy Snow

**Community of Residence:** Fairbanks, AK

I would like to speak on the loss that I have seen in my life. When I was growing up in Nenana, living on the Tanana River, fishing was what our summers focused on. I remember turning our wheel on in the morning and the box filling with fish so large it was hard for me as a kid to pew them into the boat and definitely into the back of the truck when we got back to the landing. I remember not only having enough fish to feed our family for the winter, but to also support our dog team. My childhood was spent on the land because of fishing. My summers where spent with my family because of fishing. The river is part of me because of the relationship I grew with it every summer.

Fishing created a natural bond and strong relationships in my family because we worked together to provide for ourselves for the year. The decline in the number and size of fish in my life time is devastating and it goes even deeper than that. In my lifetime so far, I have witnessed the untethering of our families because we can no longer fish for our families which meant being on the rivers together working hard. My children certainly don't have the relationship with the land and the Tanana river that I did because they don't spend the time there that I did because there are no longer the fish populations to sustain that way of life.

My family now has to travel over 500 miles to get salmon to fill our freezers for the winter. Although dip netting in Kenia as a family has become a family tradition, it is a far cry from spending the summer walking out our front door, jumping in our boat, riding to our fishwheel, and working together throughout the summer with our family to provide for ourselves from the land that we call home.

Our fish are being intercepted before they have a chance to make it back to their spawning grounds to rebuild this stocks, and this is not ok! The depletion of fish is negatively effecting our family structure, our physical, mental, emotional and spiritual health, and our relationship with the land that we were born to care for.

Thank you for your time and thank you for showing up to make a difference. I would also like to know if there is anything I can do to create a positive change in the devastating reality we find ourselves in concerning our fish.

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February 3, 2026

**Subject: Response to Proposals Reducing Area M Fishing Opportunity**

To the Alaska Board of Fisheries,

I am submitting this letter in opposition to proposals that would reduce time, area, or management flexibility in Area M salmon fisheries, to include Proposals: 108, 109, 110, 111, 112, 120, 126, 127, 128, 129, 130, 131, 132, **136**, 140, 141, 143, 148, and 152.

Our community is directly connected to Area M fisheries through shared fishermen and families, shared workforce, and shared regional economies. Unangas and locals in our region rely on income from Area M fisheries to support their families and remain in the community year-round; reductions in Area M opportunity have immediate and lasting consequences for them all.

**Opposed to:**

**Proposals That Reduce or Eliminate the June Area M Fishery:** (Proposals 127–132, 136, 140, 141, 143). These proposals shorten the June fishery, reduce available fishing areas, or eliminate fishing opportunity entirely. Proposal 136, in particular, would result in a full shutdown of the June fishery.

- June fishing income is **critical** for paying for fuel, housing, utilities, food, and childcare in remote Aleutian communities.
  - Lost fishing time cannot be recovered later in the season.
- 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 does not share a single cause.

Reducing or eliminating the June fishery would create **severe** economic harm **without** delivering meaningful conservation benefits.

**Proposals That Remove Adaptive Management Tools** (Proposals 120, 126, 140, 141)

These proposals replace flexible, in-season management with rigid regulatory restrictions.

- Area M has already reduced chum harvest through adaptive management, and those efforts **have been successful**.
- Removing flexibility makes it harder to responsibly manage mixed-stock fisheries.
- In a period of rapid environmental change, fixed closures increase risk for communities without improving outcomes for salmon.

These proposals undermine management approaches that are already working.

**Proposals That Misidentify the Cause of Salmon Declines** (Proposals 108–112, 148, 152)

These proposals place additional restrictions on Area M fisheries while failing to address the primary drivers of salmon declines.

- Climate change and habitat stressors **are** major factual contributors and cannot be “regulated away.”
- Targeting Area M fishing opportunity avoids addressing more complex but necessary solutions.
- Further restrictions would fall hardest on our small, rural coastal communities.

This approach shifts the burden of conservation onto communities that did not cause the problem.

**Community Impacts-** If these proposals are adopted, the impacts would include:

- **Loss of income** that supports families and local businesses
- **Increased cost-of-living pressure** in an already high-cost, remote communities
- **Threats to schools, utilities, and essential services** as families may be forced to leave
- **Fewer year-round jobs**, weakening long-term community stability

Once these impacts occur, they are difficult — and sometimes impossible — to reverse.

**Request to the Board of Fisheries**

I respectfully request that the Board:

- Reject proposals that **unnecessarily reduce fishing time, area, or flexibility** in Area M
- Recognize that Area M fisheries are **not** the primary driver of salmon declines
- **Maintain** adaptive management tools that balance conservation with community sustainability

Thank you for considering the **real-world impact** of these proposals, recognizing what is at stake for all of us who live and work in this region and ensuring that fisheries management decisions do not undermine the long-term viability of our region.

Respectfully,



Marii Swetzof  
Atxam Corporation  
President/CEO

February 3<sup>rd</sup>, 2025

To:

Chair Märit Carlson-Van Dort  
Alaska Board of Fisheries  
c/o Alaska Department of Fish and Game (ADF&G) Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
*Submitted via online portal*

**RE: Comments on Alaska Peninsula / Aleutian Island / Chignik Finfish (Area M) 2026 Proposals**

Dear Chair Carlson-Van Dort and Board Members,

Tanana Chiefs Conference (TCC) is a Tribal consortium serving 42 member communities — including 37 federally recognized Tribes — across 245,000 square miles of Interior Alaska. Serving more than 18,000 Alaska Native Tribal Members, TCC works to protect and sustain Traditional Ways of Life that depend on healthy salmon runs. Salmon are essential to food security, cultural continuity, and economic resilience for Yukon and Interior communities, making their conservation a critical Tribal priority.

Our positions on the proposals are as follows:

Proposal	Position	Comments
106	Support	Expands subsistence opportunity without increasing commercial pressure.
107	Support	Improves reporting and accountability without increasing fishing effort.
108	Support	Removes early fishing during peak Western Alaska salmon migration.
109	Oppose	Expands fishing area and increases mixed-stock interception risk.
110	Support	Reduces gear efficiency, lowering unintended salmon harvest.
111	Support	Improves reporting accuracy; indirect conservation benefit.
112	Oppose	Relies on triggers instead of preventing early chum interception.
113	Oppose	Expands fishing in a mixed-stock corridor without safeguards.
114	Oppose	Removes sunset review during ongoing stock declines.
115	Oppose	Expands EO-based fishing without protecting weak stocks.
116	Neutral	Weekly closures help, but occur too late to protect early migrants.
117	Support	Improves steelhead bycatch reporting and oversight.
118	Support	Strengthens bycatch documentation and accountability.
119	Oppose	Expands fishing pressure in mixed-stock waters.
120	Support	Limits early high-efficiency seine effort.
121	Oppose	Removes sockeye safeguards, increasing interception risk.
122	Oppose	Increases harvest allocation despite weak runs.



123	Oppose	Weakens fixed protections and increases uncertainty.
124	Oppose	Lowers assumed Chignik stock share, increasing fishing opportunity.
125	Oppose	Aligns effort with Chignik openings, increasing interception.
126	Support	Reduces fishing in high-risk June interception areas.
127	Support	Establishes a 10-day June closure during peak migration.
128	Support	Links fishing limits to bycatch levels of priority stocks.
129	Support	Delays June openings to reduce early interception.
130	Support	Shortens June fishing to increase salmon passage.
131	Support	Creates a fixed June closure for high-efficiency gear.
132	Support	Replaces triggers with fixed closures to improve passage.
133	Support	Adds targeted closures to improve migratory passage.
134	Oppose	Expands June fishing during peak migration.
135	Oppose	Non-retention does not reduce encounters or effort.
136	Support	Full June closure maximizes conservation benefit.
137	Oppose	Extends fishing into peak Western Alaska migration.
138	Oppose	Expands late-June fishing without conservation triggers.
139	Oppose	Expands fishing without stock-based safeguards.
140	Support	Shifts fishing toward terminal areas, reducing interception.
141	Support	Adds enforceable king salmon caps and closures.
142	Oppose	Expands flexibility without conservation guardrails.
143	Support	Improves stock monitoring and adaptive closure ability.
144	Oppose	Expands test fishing without proven conservation benefit.
145	Oppose	Duplicate of 142 with same risks.
146	Oppose	Extends fishing time during sensitive migration period.
147	Oppose	Expands gear efficiency and interception risk.
148	Support	Reduces seine depth to lower unintended catch.
149	Oppose	Expands setnet length, increasing fishing power.
150	Neutral	Technical changes with no conservation gain.
151	Support	Removes efficiency-boosting gear modification.
152	Support	Reduces purse seine size to limit interception.
153	Oppose	Increases net efficiency without safeguards.
154	Neutral	Targets herring, not salmon; minimal interception effect.
155	Support	Clarifies sport rules without increasing fishing effort.
156	Support	Protects small king salmon stocks via retention ban.
157	Support	Eliminates king salmon harvest in Sandy River.
158	Support	Strengthens conservation for Sandy River kings.
159	Support	Reduces hooking mortality and harvest.
160	Support	Strengthens no-bait king salmon protections.

161	Support	Creates a structured king salmon conservation plan.
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Western Alaska chum and Chinook salmon migrate through Area M during a well-documented peak window in early to mid-June, when they are most vulnerable to interception in mixed-stock commercial fisheries. Scientific evidence and genetic data show that a significant portion of the chum encountered during this period originates from Coastal Western Alaska (CW) and Arctic-Yukon-Kuskokwim stocks, which remain at critically low abundance.

When interception occurs during this peak migration window, the consequences are felt far beyond Area M — in communities where salmon are not just a commercial resource, but the foundation of food security, culture, health, and local economies.

Effective conservation requires preventing interception before it happens, not reacting after the fact. Fixed, time-certain closures and meaningful reductions in fishing power during peak migration are the most reliable and enforceable tools to ensure more salmon reach their home rivers.

Finally, the burden of conservation must be shared fairly. Tribal and subsistence communities have already absorbed profound losses — including closed fisheries, empty smokehouses, and cultural disruption — while offshore and interception fisheries continue to operate. A balanced and just management approach requires that those fishing in high-risk interception corridors carry a proportionate share of the conservation responsibility.

We urge the Board to adopt proposals that meaningfully reduce interception of CW and AYK salmon during peak migration, support long-term stock recovery, and uphold Alaska's commitment to equitable, science-based, and precautionary fisheries management.

Sincerely,  
Tanana Chiefs Conference

**Brain Ridley**  
Chief/Chairman

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 Kiley Thompson. I am a permit holder, small business owner, and community member in Sand Point. I have been involved in Area M fisheries since 1993 and am wholly dependent on this fishery.

Any negative outcomes from these proposals will continue the outward migration and economic decline of our 100% fisheries-reliant communities. As a permit holder and business owner, this fishery is my livelihood.

Since the adaptive management plan took effect, permit participation has continued to decline at an alarming rate. At the same time, school enrollment across the region has continued to fall. These are direct indicators of community instability caused by reduced fishing opportunity.

Further restrictions would hit small rural coastal communities the hardest. Removing management flexibility makes it harder to operate safely and sustainably, and continued reductions will accelerate the loss of families, businesses, and essential services.

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,

Kiley Thompson  
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 Sand Point; my grandfather is from Unga Village on Unga Island. I am a graduate of the Aleutians East School District, and my Unangan ancestors have lived along these waters for thousands of years.

Living in the Aleutians East Borough will become impossible if additional fishing time or opportunity is taken away. The cost of living, combined with minimal local job opportunities, will force us out. The salmon fishery provides opportunity and stability for me and my family to stay on our ancestral homelands. Job security provided by the salmon fishery is one of the main reasons people can stay in our communities.

Reductions in the June salmon fishery would have significant impacts on my livelihood, my family and friends, and my connection to my Unangan culture. The local economy will slowly unravel. Schools will see decreased funding. Access to our subsistence lifestyles will become impossible after we can no longer afford to live here. The domino effect will begin in our region if fishing time or opportunities decrease.

The closure of Peter Pan Seafoods, combined with poor fishing seasons, has already devastated the community of King Cove. People lost their jobs, boats lost their markets, and they cannot deliver or process fish there, leaving the City struggling as a result. School enrollment is at an all-time low. Families are forced to move to Anchorage, where the cost of living is also extremely high. Members of communities near me have already experienced this scenario to some extent, and the rest of us will follow if further reductions are made.

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. Removing management tools and flexibility makes it harder to manage mixed-stock fisheries well. Further restrictions would hit small rural coastal communities hardest.

Respectfully,

Madison Thompson  
Sand Point, Alaska



1/25/2026

From:

Cody Trader,

FV Passing Storm

Area M Gillnetter/CFEC Permit Holder

To:

BOF Board Members

Dear Members,

In good faith and honest discussion, my family and I stand in opposition to proposals 108-112, 116-118, 120, 126-133, 136, 140, 141,143, 147, 148, 151, 152.

I am a proud and honored stakeholder in Area M and have fished there 15 seasons out of Port Moller, Port Heiden, False Pass and King Cove. After experiencing and participating in several board cycles I have come to learn that my net is for catching fish, but fishing is for politics.

Area M is consistently portrayed as an evil “intercept” fishery. Most notably the Yukon chum “intercept”. This story is repeated over and over at each BOF cycle by groups and individuals alike who say “every fish counts”, but who refuse to look at actual “fish counting”. The persistence and generational inheritance of this story in the face of all truth to the contrary is astonishing to watch. They are telling everyone A story, not THE story.

It saddens me that we have to constantly re-establish the truth here, told in reams of recent scientific data from ADFG and the well-known WASSIP study, and watch those that would shut us down forever play a game of pretend and feign foul play at our humble group of family fishermen/women who have done nothing but work TIRELESSLY with the BOF, through the good and decent work of CAMF, to arrive at comprehensive and highly self-restrictive solutions to appease the loudest voices in the room. The data not only show that we are not and CANNOT be the source of the Yukon chum demise but that we have drastically reduced the amount of our total chum harvest regardless. If we caught ZERO chums we would fall from approximately 5.5% of the total Arctic-Yukon-Kuskokwim run to 0%, which is the only number they seem willing to accept.

The most recent genetic study from ADFG irrefutably supports leaving our fishery intact, as all restrictive measures in Area M to date have had no correlation to the true aggravating factors responsible for Yukon chums not returning with more predictability and abundance. The Yukon chums are experiencing an inundation of competition from Asian chums and environmental stress in their own river systems. No

further board action aimed at Area M will fix any of this and any proposals aimed at doing so are either misguided, or, frankly, misleading.

The proposals targeting the June fishery in Area M are only a mish mash of the same arguments from the previous board cycle (prop 140 from previous), re-worded and divided up into SEVERAL SIMILAR proposals, a tactic familiar to all of us as “throw all of this mud at the wall and see what sticks”. The sheer amount of the proposals aimed at our fishery speaks to a concerted effort to inundate the Board with a negative image of Area M in the hopes that a yes vote on any one of them will be the “compromise” they seek. Whereas a yes vote on any one of them is the death-nail for us and the true goal.

The Yukon chum decline is never going to be truly addressed if these types of ill-advised and often deceitful proposals keep everyone so busy fighting over them that actual solutions to these problems can find no fertile ground. Real problems need real solutions. I want ALL fisheries and fishermen to thrive and be sustainable. I am especially concerned with the Yukon chum stock and as a good steward I want to help those fishermen achieve success and good returns. We will never get there together if those same fishermen are willing to completely remove me from the picture with no evidence to support such drastic action. By this logic nobody gets to fish aside from Yukon harvesters, and in such efforts, conservation and good natured discussions become polarized and turn into counter-productive fish politics.

Area M fishermen are under existential pressures in our own river systems, market forces, and canneries folding. Our fishing opportunities are already heavily restricted to protect Yukon chums. The last BOF saw it fit to allow us to fish in June with current chum restrictions and adaptive-management tactics in-tact, and the data compiled since then show that this was a prudent decision. The current plan is effective and IS delivering lower relative chum harvests as designed. The new suite of proposals aimed at dismantling this positive cooperative work runs headlong into a brick wall of logic and good science.

Thank you for your time served on the BOF and your consideration of these important matters.

Respectfully,

Cody Trader

F/V Passing Storm



**Traditional Council of Togiak  
 Resolution No. 2026-02**

**A Resolution Opposing Proposal 188 Regarding Herring Allocation**

**WHEREAS**, the Traditional Council of Togiak and its Tribal Members have relied on Pacific herring since time immemorial for subsistence, cultural practices, food security, and the continuation of Yup'ik traditions; and

**WHEREAS**, herring are a cornerstone species within the Bristol Bay ecosystem and are essential prey for numerous other species, including salmon, halibut, seabirds, and marine mammals that Tribal Members also depend upon for subsistence and cultural use; and

**WHEREAS**, any reduction in herring abundance or changes in herring distribution may have cascading impacts on these interconnected species and the overall health of the marine ecosystem; and

**WHEREAS**, Proposal 188 would allocate additional herring catch without definitive, current, and reliable biomass estimates, creating significant uncertainty regarding the sustainability of increased harvest levels; and

**WHEREAS**, allocating additional catch in the absence of accurate biomass data poses an unacceptable risk to herring populations and to the long-term subsistence needs of the Togiak Tribe and future generations; and

**WHEREAS**, the Tribe is actively exploring and developing potential herring markets and uses that are locally driven, culturally appropriate, and intended to provide long-term economic opportunities for the community; and

**WHEREAS**, premature increases in harvest allocation could undermine Tribal efforts to responsibly manage, utilize, and benefit from herring resources in a manner consistent with traditional knowledge and conservation principles; and

**WHEREAS**, Tribal Traditional Ecological Knowledge emphasizes precaution, respect for ecological balance, and management decisions based on observed conditions and long-term stewardship rather than short-term extraction;

**NOW, THEREFORE, BE IT RESOLVED**, that the Traditional Council of Togiak formally opposes Proposal 188; and

**BE IT FURTHER RESOLVED**, that the Traditional Council of Togiak urges state and federal fisheries managers to prioritize subsistence use, ecosystem health, and precautionary management of herring stocks; and

**BE IT FURTHER RESOLVED**, that no additional herring catch allocations should be approved until accurate and transparent biomass assessments are conducted and demonstrate that such allocations will not harm subsistence uses or dependent species; and

**BE IT FINALLY RESOLVED**, that the Traditional Council of Togiak affirms its commitment to sustainable herring management, the protection of traditional subsistence practices, and the responsible development of herring uses that benefit the Togiak community now and for generations to come.

**ADOPTED** by the Traditional Council of Togiak on this 27 day of January, 2026.



Tribal President



Tribal Secretary