

February 21, 2026

My name is Karen Gillis and I'm here on behalf of Bering Sea Fishermen's Association, an organization serving 128 communities in the Arctic, Yukon, Kuskokwim, and Bristol Bay regions of Alaska focused on the protection of rights and access for small boat commercial and subsistence fishermen.

There is clear data demonstrating the conservation crisis occurring in the AYK. This is due to a combination of environmental, ecological, and human-driven factors such as overconfident management decisions.

We are asking you to address a documented impact to Chinook and chum salmon which is **directly under human control**.

Interceptions in Area M have been a conservation concern for decades, triggering numerous research studies, Board of Fisheries action, and voluntary efforts by the commercial fleet who recognize the need to curtail harvest during annual migrations in June.

In every other fishery in Alaska except Area M - the policy and practice of ADF&G is to close commercial fishing on a stock when escapement needs or subsistence opportunity is not being provided.

Current Area M practices blatantly prioritize commercial fishing over escapement and subsistence, a violation of the Sustainable Salmon Fisheries Policy and statues listing subsistence uses over other uses.

Allowing the commercial utilization of AYK Chinook and chum salmon that are not meeting river management and spawning escapement goals violates Article 8 Section 4 of the Alaska Constitution.

BSFA does not support caps or trigger approaches and references **5 AAC 39.222(c)(3)(E)**. Triggers cannot be effectively monitored, complied with, controlled or enforced; therefore, they should not be part of the regulations to control human-induced sources of fishing mortality per board policy. See also, RC50.

We are in full support of proposals 136 and 131. I reference RC77 which shows shutting down the South Peninsula fishery in the middle of June will preserve salmon when they are at the highest abundance.

With the Yukon River 7-year agreement in place between the US and Canada it is expected that the US will do everything it can during this time as the US agreed to...

“...increase the in-river run of Yukon River origin Chinook salmon by reducing marine catches and bycatches of Yukon River origin salmon to the extent practicable.” (see RC66 bullet #9)

As it pertains to the processors holding the Area M fleet accountable within their adaptive management program we believe someone needs to hold the processors accountable for issuing blank fish tickets and dumping fish off the docks (see RC81 & 83).

Relying on self-policing often sounds efficient - but it has serious weaknesses. When people regulate themselves, they're judging their own behavior and some professions use partial self-regulation, but they typically function alongside government oversight, not instead of it.

Thank you.