



Bering Sea Fishermen's Association
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February 24, 2026

Dear Chairperson Carlson-Van Dort and Members of the Board of Fisheries:

Since 1979, Bering Sea Fishermen's Association (BSFA) has served small boat commercial fishermen living in the Arctic, Yukon, Kuskokwim and Bristol Bay regions of Alaska. BSFA is a nonprofit corporation supporting 128 vibrant fishing communities by fostering greater social, financial, and political capacity to access, sustainably develop, and protect fisheries in the Arctic, Yukon, Kuskokwim (AYK), and Bristol Bay regions of Alaska.

We have heard testimony, reviewed the data and stayed up to date with the Record Copies submitted during the 2026 Alaska Peninsula/Aleutian Island/Chignik Finfish meeting.

In order to measurably mitigate current conservation concerns for AYK salmon stocks, BSFA supports RC245 as submitted by Board Member Irwin.

We have compared this to RC160 submitted by Board Member Wood and find RC245 provides a more balanced approach to share the responsibility of the conservation concerns at hand.

There is a very simple correlation, regardless of changes in genetic composition over time, of Area M intercepting all five species of salmon that have spawning grounds in the Arctic-Yukon-Kuskokwim (AYK) and Bristol Bay. In times of low abundance, this interception becomes more pronounced as one of the factors that humans can control versus those factors that we cannot.

Existing regulations already passed by the Board of Fisheries speak of sustained-yield principles¹, avoidance of overharvest of mixed-stock fisheries², management plans based on attaining escapement goals³, the priority of subsistence⁴, and equitable sharing of resources by all users of fishery resources⁵. All these regulations require action to encourage the return of chum to their natal western Alaska watersheds.

Finding our balance on AYK Area M intercept means Area M must share in the burden of conservation. The AYK has already exhausted all their mitigation possibilities and is paying the heaviest cost.

Thank you for the opportunity to offer our most recent thoughts and suggestions through the Record Copy process.

Sincerely,


 Karen Gillis

¹ 5AAC 39.222. Policy for the management of sustainable salmon fisheries. (c)(1)(G)

² Sec.16.05.251. Regulations of the Board of Fisheries. (17)(h); 5AAC.39.220. Policy for the management of mixed stock fisheries. (a), (b), (c)

³ 5AAC 39.222. Policy for the management of sustainable salmon fisheries. (c) (2) (A-H); (c) (3)(C); (c)(F); (c)((5)(A)

⁴ 5AAC 99.010. Boards of Fish and Game subsistence procedures. (c)

⁵ Sec. 16.05.251. Regulations of the Board of Fisheries. (17)(e)(1-7)