

ALASKA DEPARTMENT OF FISH AND GAME

STAFF COMMENTS ON
COMMERCIAL, PERSONAL USE, SPORT, AND SUBSISTENCE
REGULATORY PROPOSALS
COMMITTEE OF THE WHOLE—GROUPS 1–4
FOR

BRISTOL BAY FINFISH

ALASKA BOARD OF FISHERIES MEETING
ANCHORAGE, ALASKA

January 13–18, 2026



Regional Information Report No. 5J25-05

The following staff comments were prepared by the Alaska Department of Fish and Game (department) for use at the Alaska Board of Fisheries (board) meeting, January 13–18, 2026, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

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ANCHORAGE, ALASKA**

JANUARY 13–18, 2026

by
Alaska Department of Fish and Game

Alaska Department of Fish and Game
Division of Sport Fish, Research and Technical Services
333 Raspberry Road, Anchorage, AK 99518–1565

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ABSTRACT

This document contains Alaska Department of Fish and Game (department) staff comments on commercial, personal use, sport, and subsistence regulatory proposals for Bristol Bay finfish. These comments were prepared by the department for use at the Alaska Board of Fisheries meeting, January 13–18, 2026, in Anchorage, Alaska. The comments are forwarded to assist the public and board. The comments contained herein should be considered preliminary and subject to change, as new information becomes available. Final department positions will be formulated after review of written and oral public testimony presented to the board.

Keywords: Alaska Board of Fisheries (board), Alaska Department of Fish and Game (department), staff comments, regulatory proposals, fisheries, commercial, personal use, sport, guided sport, subsistence, Bristol Bay, finfish, regulations, management plans, escapement goals, stock of concern, methods, means, bag limits, allocation, salmon.

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Summary of department positions on regulatory proposals for Bristol Bay finfish; Anchorage, January 13–18, 2026.

Proposal number	Department position	Issue
Group 1: Subsistence, Nushagak Stock of Concern Plan, Westside Management		
44	N	Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery, and report all king salmon harvested.
61	N	Repeal provisions allowing commercial fishing, adopt date-specific provisions for opening commercial fisheries based on king salmon inriver projected run size, and prohibit the retention of king salmon in the sport fishery.
62	N	Prohibit commercial fishing in the Nushagak District with drift gillnets and in the Nushagak Section with set gillnets until June 28, unless the king salmon count at the sonar near Portage Creek has exceeded 55,000.
63	O/N	<i>Amend the Nushagak District King Salmon Stock of Concern Management Plan.</i>
64	N	Open the Wood River Special Harvest Area to harvest surplus Wood River sockeye salmon, while the broader Nushagak District would remain closed for king salmon conservation.
65	O/N	Remove Wood River Special Harvest Area from Nushagak District allocation calculations and amend and adopt Nushagak District King Salmon Stock of Concern Management Plan to include set gillnet-specific provisions.
66	O/N	Modify the sport fishing gear allowed in <i>Nushagak District King Salmon Stock of Concern Management Plan</i> .
67	O/N	Modify the sport fishing gear, size restrictions and area open for king salmon in Nushagak River drainage.
68	O/N	Adopt an optimal escapement goal for Nushagak River king salmon.
69	N	Adopt a recovery goal for Nushagak River king salmon.
58	N	Modify the trigger to open the Wood River Special Harvest Area when the total run is estimated to be over 5 million fish.
59	N	Ensure drift gillnet fishing opportunity in the Wood River Special Harvest Area, regardless of allocation.
60	O/N	Increase the length of a set gillnet in the Wood River Special Harvest Area.
56	S/N	Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery.
57	S/N	Adopt offshore locations used in the Nushagak District set gillnet fishery for the drift gillnet fishery and prohibit drift gillnet gear from coming into contact with set gillnet gear.
54	S	Repeal the Nushagak River Coho Salmon Management Plan.
55	S	Repeal the Nushagak River Coho Salmon Management Plan.
Group 2: Eastside Management, Fishing Districts, and Fishing Seasons, Periods, and Reporting		
45	N	Reinstate provision that set gillnets are the only lawful gear for subsistence fishing for salmon in the Naknek, Alagnak, and Wood River Special Harvest Areas.

-continued-

Summary of department positions on regulatory proposals (page 2 of 3).

46	N	Amend the dates described in the Naknek-Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.
47	N	Amend the dates in which commercial fishing may be allowed by emergency order in the Naknek-Kvichak District.
48	N	Modify the fishing period ratio between the set gillnet and drift gillnet gear groups, and change the distance in which gear associated with set gillnet fishing must be removed in the Kvichak River Special Harvest Area.
49	N	Modify the ratio of fishing periods between set gillnet and drift gillnet gear groups, based on gear type-specific participation in the Kvichak River Special Harvest Area.
50	O/N	Incorporate fish quality considerations into commercial salmon fishery management decisions in Bristol Bay.
51	S	Allow extra drift gillnet to be carried on board the vessel in the Kvichak River Special Harvest Area.
52	O/N	Create an Upper Egegik River Sockeye Salmon Special Harvest Area Management Plan.
53	O	Close a portion of the Egegik District to mitigate illegal fishing activity.
70	N	Extend the northern boundary in the Ugashik District.
71	O/N	Reestablish a General District Salmon Management Plan.
72	O/N	Reestablish a General District Salmon Management Plan.
73	O/N	Reestablish a General District Salmon Management Plan.
74	O/N	Reestablish a General District Salmon Management Plan.
92	N	Close the Naknek-Kvichak District to commercial fishing on July 25.
93	O	Increase commercial fishing time in the Togiak District.
94	S	Remove the 48-hour maximum extension time for Togiak River Section in regulation.
95	S/N	Modify early season registration requirements.
Group 3: Gear Specifications. Vessel Specifications		
75	N	Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery.
76	N	Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery.
77	NA	Create a new permit category “E” to permanently allow permit stacking and limit the number of these “E” permits to 300.
78	N	Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery.
79	N	Repeal the maximum offshore operation distance for commercial set gillnets in the Ugashik River.
80	N	Allow joint venture set gillnet fishing operations in Bristol Bay.
81	NA	Allow the use of stationary, non-entanglement nets to harvest salmon in the Bristol Bay Management Area.
82	N	Amend multiple vessel specifications and adopt additional vessel specifications.
83	N	Extend the overall length of a vessel registered for salmon net fishing in Bristol Bay and modify multiple vessel specifications.
84	N	Increase the overall length of vessels registered for salmon net fishing in Bristol Bay.
85	N	Remove vessel length and include in a separate regulation.

-continued-

Summary of department positions on regulatory proposals (page 3 of 3).

86	N	Include a reference to overall vessel length in the definition of trim tabs.
87	N	Define refrigerated seawater transom cooler and include in vessel specification and operations.
88	N	Remove anchor roller specifications.
89	N	Increase the allowable size of an anchor roller.
90	N	Add gillnet roller specifications.
91	N	Amend the definition of an outdrive guard
Group 4: Sport Fisheries, Miscellaneous		
96	O	Prohibit the use of bait and multiple hooks in the Naknek River drainage.
97	O	Prohibit barbed hooks, the use of bait, and multiple hooks while sport fishing for rainbow trout and char and prohibit fish from being removed from the water prior to release in the Naknek River drainage.
98	N	Lower the annual limit of king salmon over 28 inches in length in the Naknek River.
99	N	Prohibit sport fishing for king salmon in a portion of the Naknek River.
100	N	Prohibit sport fishing for king salmon in a portion of the Naknek River.
185	N	Adopt a Naknek River King Salmon Management Plan.
101	O	Prohibit the use of bait and multiple hooks in the Egegik and Ugashik drainages.
102	N	Increase the area open to sport fishing for king salmon and modify the dates that bait is allowed in the Togiak River drainage.
103	O	Prohibit the placing of any substance in the water by guides and guided anglers for the purpose of attracting fish by scent (chumming).
104	O	Prohibit barbed hooks in Moraine, Kulik, American, and Brooks drainages from June 8 to October 31.
105	N	Establish a Bristol Bay King Salmon Management Plan.
188	S/N	Reallocate 15% of the unharvested Togiak sac roe herring guideline harvest level (GHL) to the Dutch Harbor food and bait fishery if less than 90% of the Togiak sac roe GHL level is harvested by May 31.

Note: N = Neutral; S = Support; O = Oppose; NA = No Action, WS = Withdrawn Support.

COMMITTEE OF THE WHOLE–GROUP 1: SUBSISTENCE, NUSHAGAK KING SALMON STOCK OF CONCERN MANAGEMENT PLAN AND WESTSIDE MANAGEMENT (17 PROPOSALS)

SUBSISTENCE (1 PROPOSAL)

PROPOSAL 44 – 5 AAC 01.XXX. New Section, and 5 AAC 06.377. Reporting requirements

PROPOSED BY: Kent Anderson

WHAT WOULD THE PROPOSAL DO? This would limit the subsistence harvest and commercial retention of king salmon for personal use (homepack) in Bristol Bay and mandate reporting requirements.

WHAT ARE THE CURRENT REGULATIONS? Subsistence users must obtain a household subsistence permit before subsistence salmon fishing in Bristol Bay. They must report all salmon harvested on their permit and return the permit to the department. There is no limit for king salmon harvest by subsistence users in Bristol Bay; however, the *Nushagak-Mulchatna King Salmon Management Plan* specifies when and how the subsistence fishery should be restricted, if necessary. If the spawning escapement of king salmon is projected to be less than 55,000 fish, the Commissioner may reduce area by emergency order for the inriver king salmon subsistence fishery.

Commercial fishermen are allowed to keep salmon from their harvest – this is commonly referred to as ‘homepack.’ There is no limit on the number of fish that can be kept. Fish must be reported on fish tickets, and they are for personal use only; they are not subsistence harvest and may not be sold or bartered.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would create a limit on the number of king salmon that could be kept in the subsistence fishery and kept for personal use as “homepack” in the commercial fishery. In the commercial fishery, if a limit were put on king salmon that could be kept for personal use, fishermen would be required to sell the “overlimit” fish to the commercial market. If all or a greater proportion of king salmon caught in the commercial fishery were required to be sold, this may improve the accuracy of king salmon commercial harvest reporting.

The effect of a harvest limit on subsistence harvests of king salmon is unknown. There is no ANS specifically for king salmon; rather, the ANS is for all salmon. While king salmon subsistence harvests may decrease, given the availability of other salmon, overall salmon subsistence harvest may not decrease. Subsistence fishermen are already required to report harvests to the department.

BACKGROUND: At its November 2022 meeting, the board designated the Nushagak River king salmon stock as a stock of management concern, citing that 5 of 6 years between 2017 and 2022 failed to meet the inriver escapement goal of 95,000 fish. In the 20 years prior to this designation

(2003–2022), escapement estimates averaged 124,473 fish. However, in the 6 years leading up to the designation (2017–2022), the average escapement dropped to 52,946 fish. Since implementing the Nushagak District King Salmon Stock of Concern Management Plan, the average escapement has declined to 32,793 fish. Total king salmon harvest numbers in the commercial fishery reflect a similar trend, with the average annual harvest falling from 42,189 fish (2003–2022) to 31,864 fish (2017–2022) and further down to 11,320 fish in the years 2023–2025.

There is a positive customary and traditional use finding for all finfish in the Bristol Bay area. The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses in the Bristol Bay area.

Subsistence salmon permits have been required in Bristol Bay since 1985. An average of 1,097 permits have been issued since the beginning of the permit program; more recently, an average of 965 subsistence salmon fishing permits have been issued annually from 2020–2024 (Table 44-1). The subsistence salmon harvest is made up of 79% sockeye salmon. During the most recent 5-year period for which data is available (2020–2024), subsistence harvests averaged 6,280 king salmon, down from the 2015–2024 average annual subsistence harvest of 10,222 king salmon. Most of the subsistence king salmon are harvested from the Nushagak District (Table 44-2). Similar to the subsistence fishery, the majority of commercial homepack salmon harvest is sockeye salmon, representing an average of 65% with the remaining 35% being king salmon. In 2025, Bristol Bay wide 4,200 salmon were reported as homepack in the commercial salmon fishery, of which 1,350 were king salmon (44-2).

The set gillnet fleet has historically retained more homepack than the drift gillnet fleet, accounting for nearly 70% of all homepack king salmon harvest. This is primarily due to the set gillnet fleet's access to onshore facilities for storing and processing fish, whereas the drift gillnet fleet is generally limited by the capacity of onboard freezers.

For many commercial fishermen, homepack can be an important source of salmon that would otherwise be harvested in a subsistence fishery. A short, fast-paced season often limits a commercial fishing family's ability to secure household needs through traditional subsistence fishing activities. This nexus, for example, has been directly recognized by the board in the lower Copper River area, near Cordova, where ANS is directly tied to commercial fishing opportunity, with the ANS increasing when the commercial fishery is closed.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Existing reporting requirements in the commercial and subsistence fisheries provide the department with king salmon harvest information, but it is likely, based on previous testimony to the board, that commercial 'homepack' harvest is underreported. Existing management plans provide the department with directions for restricting subsistence fisheries when warranted. Restricting subsistence harvests based on time and area better accommodates traditional subsistence practices. To meet the board's statutory responsibility under the subsistence law, it should consider whether subsistence and commercial 'homepack' retention regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is expected to result in an additional cost to the department from the administration of new reporting requirements.

Table 44-1.—Estimated historical subsistence salmon harvests, Bristol Bay, Alaska, 1990–2024.

Year	Permits		Estimated salmon harvest						Salmon per permit
	Issued	Returned	Sockeye	Chinook	Chum	Pink	Coho	Total	
1990	1,042	870	128,343	13,462	9,224	4,455	8,389	163,874	157
1991	1,194	1,045	137,837	15,245	6,574	572	14024	174,251	146
1992	1,203	1,028	133,605	16,425	10,661	5,325	10,722	176,739	147
1993	1,206	1,005	134,050	20,527	6,539	1,051	8,915	171,082	142
1994	1,193	1,019	120,782	18,873	6,144	2,708	9,279	157,787	132
1995	1,119	990	107,717	15,921	4,566	691	7423	136,319	122
1996	1,110	928	107,737	18,072	5,813	2,434	7,519	141,575	128
1997	1,166	1,051	118,250	19,074	2,962	674	6196	147,156	126
1998	1,234	1,155	113,289	15,621	3,869	2,424	8,126	143,330	116
1999	1,219	1,157	122,281	13,009	3,653	420	6143	145,506	119
2000	1,219	1,109	92,050	11,547	4,637	2,599	7,991	118,824	97
2001	1,226	1,137	92,041	14,412	4,158	839	8406	119,856	98
2002	1,093	994	81,088	12,936	6,658	2,341	6,565	109,587	100
2003	1,182	1,058	95,690	21,231	5,868	1,062	7,816	131,667	111
2004	1,100	940	93,819	18,012	5,141	3,225	6,667	126,865	115
2005	1,076	979	98,511	15,212	6,102	1,098	7,889	128,812	120
2006	1,050	904	95,201	12,617	5,321	2,726	5,697	121,564	116
2007	1,063	917	99,549	15,444	3,991	815	4880	124,679	117
2008	1,178	1,083	103,583	15,153	5,710	2,851	7,627	134,924	115
2009	1,063	950	98,951	14,020	5,052	442	7982	126,447	119
2010	1,082	979	90,444	10,852	4,692	2,627	4,623	113,238	105
2011	1,122	1,039	101,017	14,106	3,794	333	7493	126,744	113
2012	1,107	932	100,728	12,136	4,007	1,874	3,837	122,582	111
2013	1,162	986	98,765	12,858	5,173	333	8635	125,764	108
2014	1,158	1,031	99,008	17,417	6,677	2,689	8,984	134,775	116
2015	1,169	1,072	99,535	13,874	3,573	458	7,659	125,100	107
2016	1,172	1,057	85,989	18,712	5,243	4,945	6,255	121,144	103
2017	1,110	1,000	89,704	12,985	4,907	553	8,154	116,303	105
2018	1,105	925	78,666	13,758	4,030	1,135	6,913	104,502	95
2019	1,106	860	75,320	11,488	3,451	398	6,219	96,876	88
2020	1,018	765	78,679	9,369	2,425	595	5,493	96,561	95
2021	1,019	528	75,007	5,099	1,252	463	5,611	87,433	86
2022	923	544	75,092	8,367	1,511	1,267	2,651	88,888	96
2023	902	512	75,223	3,969	1,313	258	5,149	85,911	95
2024 ^a	963	527	82,820	4,596	1,623	1,040	2,917	92,996	97
5-year average (2020–2024)	965	575	77,364	6,280	1,625	725	4,364	90,358	94
10-year average (2015–2024)	1,049	779	81,604	10,222	2,933	1,111	5,702	101,571	97
Historical average (1985–2024)	1,097	928	103,480	13,674	5,209	1,870	7,406	131,640	120

Source ADF&G Division of Subsistence, ASFDB 2025 (ADF&G 2025).

^a Data are preliminary

Table 44-2.—Average subsistence salmon harvest by district, 2015–2024.

District	Permits issued	Average salmon harvest ^a						King salmon per permit
		Sockeye	Chinook	Chum	Pink	Coho	Total	
Naknek–Kvichak District	383	43,983	513	176	165	651	45,488	1.3
Nushagak District	550	29,769	8,825	2,457	853	4,228	46,132	16.0
Togiak District	42	3,558	603	242	66	350	4,819	14.5
Egegik District	19	722	48	10	4	213	997	2.6
Ugashik District	11	554	36	5	3	98	696	3.3
Total Bristol Bay Area ^b	1,049	81,604	10,222	2,933	1,111	5,702	101,571	9

Source ADF&G Division of Subsistence, Bristol Bay subsistence salmon permit database.

^a The data for 2024 used to calculate these averages are preliminary.

^b Totals may not equal the sum of component districts. The total Bristol Bay area is calculated as the average of Bristol Bay area totals from 2015–2024, not the sum of component district averages.

Table 44-3. Bristol Bay homepack harvest by species and gear type (2005–2025).

Year	King		Sockeye		Chum		Pink		Coho		Total	
	Drift	Set	Drift	Set	Drift	Set	Drift	Set	Drift	Set	Drift	Set
2005	410	285	1,158	2,013	19	4	1	0	4	1	3,895	2,303
2006	674	282	1,622	564	59	14	0	15	7	9	3,246	884
2007	183	233	6,012	1,571	10	0	0	0	30	27	8,066	1,831
2008	136	254	2,060	2,184	16	0	2	1	247	36	4,936	2,475
2009	387	343	3,598	1,864	64	19	1	5	142	25	6,448	2,256
2010	555	609	3,668	3,053	20	77	30	65	220	256	8,553	4,060
2011	316	667	1,984	2,326	4	31	0	7	76	295	5,706	3,326
2012	263	763	2,150	870	54	15	19	188	222	96	4,640	1,932
2013	127	356	2,246	648	0	67	2	25	35	75	3,581	1,171
2014	216	597	328	1,018	51	15	0	51	179	65	2,520	1,746
2015	256	1,685	752	2,328	50	111	0	11	90	123	5,406	4,258
2016	383	1,682	627	1,492	0	4	207	20	232	18	4,665	3,216
2017	434	1,372	1,190	475	30	3	0	21	50	45	3,620	1,916
2018	328	1,129	859	1,060	2	8	0	13	103	11	3,513	2,221
2019	257	1,521	1,708	1,291	36	5	0	16	33	57	4,924	2,890
2020	393	1,091	1,862	1,024	0	1	0	93	207	90	4,761	2,299
2021	243	612	2,090	1,160	1	13	0	7	11	163	4,300	1,955
2022	175	511	937	752	0	4	0	10	0	47	2,436	1,324
2023	522	764	777	1,140	0	9	0	2	24	51	3,289	1,966
2024	344	733	1,548	1,175	7	12	0	3	5	67	3,894	1,990
2025	413	938	1,390	1,460	35	54	0	17	2	87	4,396	2,556
10 yr avg 2015– 2025	334	1,110	1,235	1,190	13	17	21	20	76	67	4,081	2,404

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

NUSHAGAK KING SALMON STOCK OF CONCERN MANAGEMENT PLAN (9 PROPOSALS)

PROPOSAL 61 – 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Kenai River Sportfishing Association.

WHAT WOULD THE PROPOSAL DO? Restrict commercial fishing in the Nushagak District with drift gillnets and in the Nushagak Section with set gillnets such that commercial fishing is not allowed prior to June 28 at 9:00 a.m. unless the king salmon inriver run size is projected to exceed 95,000 fish. It would also restrict the number of hours the commercial fishery to no more than 12 hours per day from June 28 through July 4. This would also require the Nushagak River king salmon sport fishery to be limited to catch-and-release fishing until a run size of 55,000 fish is projected.

WHAT ARE THE CURRENT REGULATIONS? There are 3 regulatory triggers that open commercial fishing in the Nushagak District. These triggers are calculated annually based on the preseason forecast as follows:

- 1) The Nushagak River salmon sonar count in the is projected to exceed 6% of the sockeye salmon forecast.
- 2) The Wood River salmon count is projected to exceed 10% of the sockeye salmon forecast.
- 3) The commercial fishery opens June 28 at 9:00 AM if neither trigger 1 nor 2 above are met.

The *Nushagak River District King Salmon Stock of Concern Management Plan* provide regulations for the department to reduce the annual limit in the sport fishery for king salmon 20 inches or greater in length to four fish, of which only one fish may be 28 inches or greater in length for each sport angler unless the total inriver king salmon run return in the Nushagak River is projected to exceed 95,000 fish. The commissioner may, by emergency order (EO), increase the annual sport fish limit for king salmon to 4 king salmon, 20 inches or greater in length, with no restrictions for fish over 28 inches in length.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce commercial king and sockeye salmon harvest and increase inriver abundance. In years when the Nushagak king salmon inriver run size is projected to be less than 95,000 fish, the commercial fishery would remain closed through June 27. The recent 5-year average total sockeye run through June 27 is 3.1 million fish. There would be no commercial fishing until 61% of king salmon run timing was complete (Figure 61-1). In years when king salmon projections remain less than 95,000, between June 28 and July 3, commercial fishing would be limited to no more than 12 hours per day. This would further reduce the commercial king and sockeye salmon harvest by an unknown amount. The limitation of hours represents a 25–50% reduction in commercial fishing time during that period. The recent 5-year average total sockeye salmon daily run between June 28 and July 3 is 1.3 million fish per day. The subsistence fishery would not be affected because the department opens it on June 1 and keeps it open until just prior to the first commercial fishing period. The sport fishery would be restricted to catch-and-release if the king salmon run is

projected to be less than 55,000. This would reduce the king salmon sport harvest by an unknown amount and increase the inriver abundance of king salmon.

BACKGROUND: In 2022, the board designated the Nushagak River king salmon run as a stock of management concern due to failure to meet the inriver goal of 95,000 king salmon in 5 of the previous 6 years. At the time of designation, the stock had not consistently failed to meet the SEG, but concerns about the accuracy of sonar assessments, particularly in 2019 and 2021, added uncertainty to SEG-based evaluations. There is uncertainty over whether escapement goals were met in some years because the lower bound of the SEG (55,000 king salmon) is within the range of the uncertainty of the primary assessment method (sonar) used to estimate the inriver run. The inriver goal (95,000 king salmon) is higher than the lower bound of the escapement goal (55,000), however, this inriver goal was likely not met in 5 years. Therefore, the inriver goal is the primary criterion that department staff use to find a chronic inability to achieve a specified management objective.

The current Nushagak River king salmon SEG (55,000–120,000) and inriver goal (95,000) were adopted in 2013 and are based on sonar counts, under the assumption that the annual king salmon sonar count accurately reflects run size. That assumption has proven to be incorrect. The Nushagak River sonar project is an index (i.e., a partial count) because the sonar covers only part of the river channel. Tagging and mark recapture studies documented that in some years, 20–60% of king salmon in the Nushagak River were not enumerated by the sonar. Recent king salmon assessments have been further compromised by the largest sockeye salmon returns ever documented on the Nushagak River. High densities of sockeye salmon create 2 problems for enumerating king salmon. First, large schools of sockeye salmon passing in front of the sonar produces a “shadowing” effect, where fish further out in the channel are obscured and not detected by sonar. Second, species apportionment relies on drift gillnet sampling, but during peak salmon passage the nets fill rapidly with sockeye salmon and drift times must be cut short. This reduces the chance of capturing enough king salmon to accurately represent their proportion of the run, particularly when king salmon make up a small fraction (< 1%) of the total salmon passage. Despite this uncertainty, the consistent failure of the sonar index to meet the inriver goal for king salmon, even with targeted management actions, led to consensus among staff that the designation as a stock of management concern was warranted.

Stock assessment information and management measures were summarized in an action plan developed at the 2022 board meeting. Prior to stock of concern designation in 2022, the department had been implementing king salmon conservation measures since runs began to decline in 2017. These management actions focused on 1) not opening the directed fishery, 2) reducing incidental catch of king salmon in the commercial sockeye salmon fishery by reducing time early in the sockeye salmon run when king salmon are more abundant, and 3) using EO authority to reduce sport harvest of Nushagak River king salmon.

Run timing of king and sockeye salmon in the Nushagak District is an important consideration that informs fishery management. King salmon arrive at the Nushagak District earlier than sockeye salmon, but there is substantial overlap in their run timing from late June through mid-July (Figure 61-1). The Nushagak District king salmon run timing on average is 50% complete on June 25 and sockeye salmon run timing is 50% complete on July 5 (Figure 61-1). An additional important

consideration is the delay between arrival in the district and arrival at the sonar counting project. It takes approximately 2 days to travel from the Nushagak District to the sonar site at Portage Creek (Figure 61-2). This means that 2 days' worth of fish are past the fishery but not yet counted. This can equate to significant numbers of sockeye salmon between the district and sonar site or Wood River tower during the early run time frame between June 25 and 30.

Since implementation of the Stock of Concern management plan, Nushagak king salmon have failed to meet the lower end SEG of 55,000 fish, with an average escapement (sonar count minus above sonar harvest) of 32,793 fish over the past 3 years (Table 61-1). As intended by the plan, commercial harvest was reduced during this period, averaging 4,457 king salmon annually, with a commercial exploitation rate of 10%, compared to 23% prior to 2023. Delays in opening the commercial fishing district occurred each year, allowing for additional passage of both king and sockeye salmon, with the number of king salmon conserved by these delays ranging from 7,982 to 11,190 fish (Table 61-2). Estimating these savings requires not only counting fish at the respective assessment projects, but also accounting for king salmon located between the fishing district and the assessment sites, especially during late June and early July, when significant pulses of fish can move upstream with each tide. This is why managers often rely on projected escapement figures rather than actual counts, as management decisions must be made in real time, often before complete data is available. Additionally, it is important to consider the uncertainty in sonar-based enumeration of king salmon at Portage Creek. Due to overlap with high sockeye passage, it is estimated that 20–60% of king salmon may be missed by the sonar, potentially resulting in an undercount of 2,000–6,000 fish when using the 10,000-fish estimate as a baseline. Even when accounting for this potential underestimation, however, escapement still likely falls short of the lower end of the SEG.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The current king salmon stock of concern action plan uses sockeye salmon triggers to balance king salmon conservation and sockeye salmon harvest potential. This approach was implemented, in part, because inseason abundance estimates of king salmon at the Nushagak River sonar are highly uncertain, particularly in years of high sockeye salmon inriver abundance. The current sockeye salmon triggers in the king salmon stock of concern action plan have resulted in foregone sockeye salmon harvest and may have increased inriver abundance of Nushagak River king salmon. Current harvest reporting and inriver estimates allow fine-scale, abundance-based harvest management. Abundance-based fishery management adjusts harvest levels in real time based on the size of returning salmon runs. This long-standing department approach allows for sustainable fishing by maximizing the probability escapement goals are met to maintain healthy fish populations, while maximizing harvest opportunities at all levels of salmon abundance.

Basing commercial fishing opportunity on sockeye salmon abundance rather than king salmon abundance as the primary tool for king salmon rebuilding has been controversial, because rebuilding king salmon becomes secondary to sockeye salmon harvest opportunity once the trigger is met. Alternatively, this proposal uses metrics based on historic king salmon run timing to pass a percentage of the king salmon return through the commercial fishery before full-scale commercial operations for sockeye salmon begin. However, opening the fishery on a fixed date reduces the department's ability to respond to inseason estimates of run abundance of sockeye salmon, and may also result in increased inriver abundance of all salmon.

It should be noted that the proposal states that the commissioner shall close commercial fisheries by EO. However, the commercial fishery is opened by EO, not closed by EO. Thus, any regulation developed from this proposal should be structured in the reverse of how it is written, i.e., the fishery shall remain closed—not shall be closed by EO.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

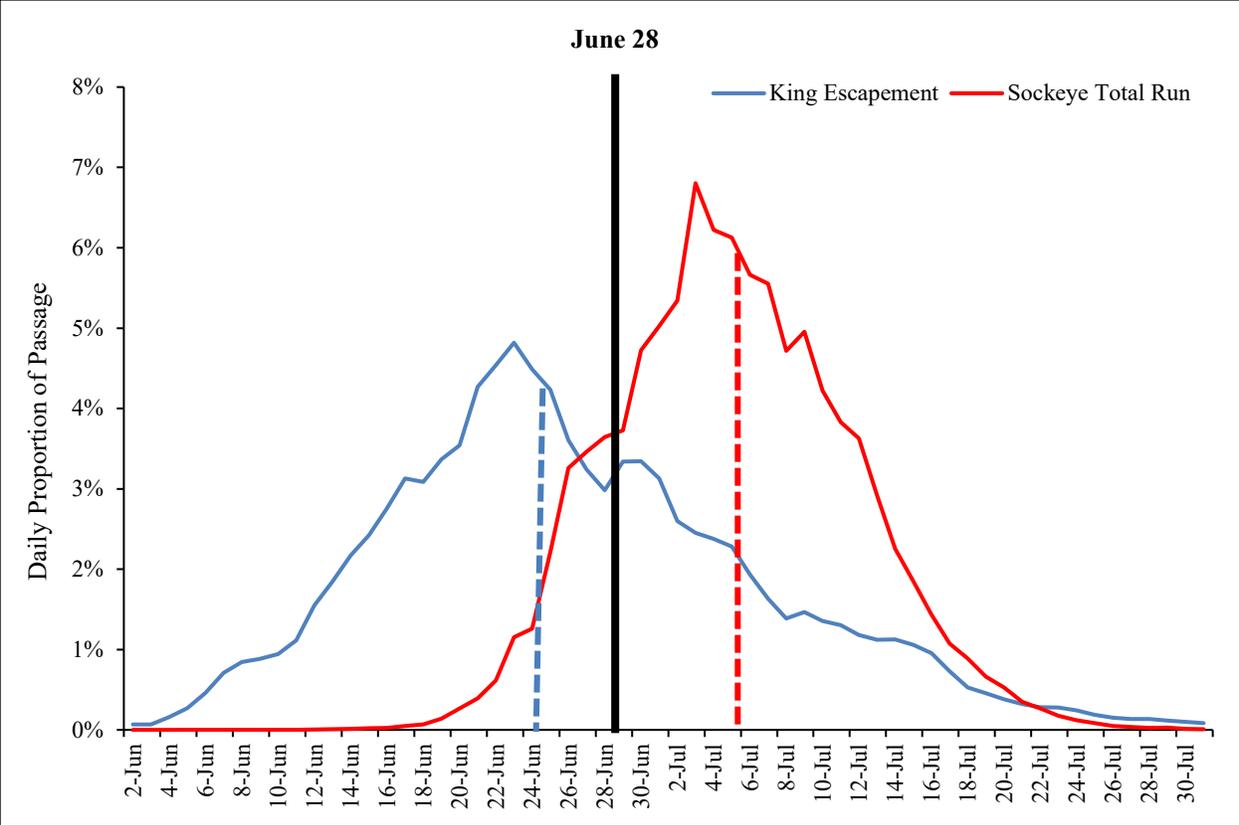


Figure 61-1.—King and sockeye salmon run timing to the Nushagak District, showing 50% midpoint (dashed vertical lines) of run timing for each.

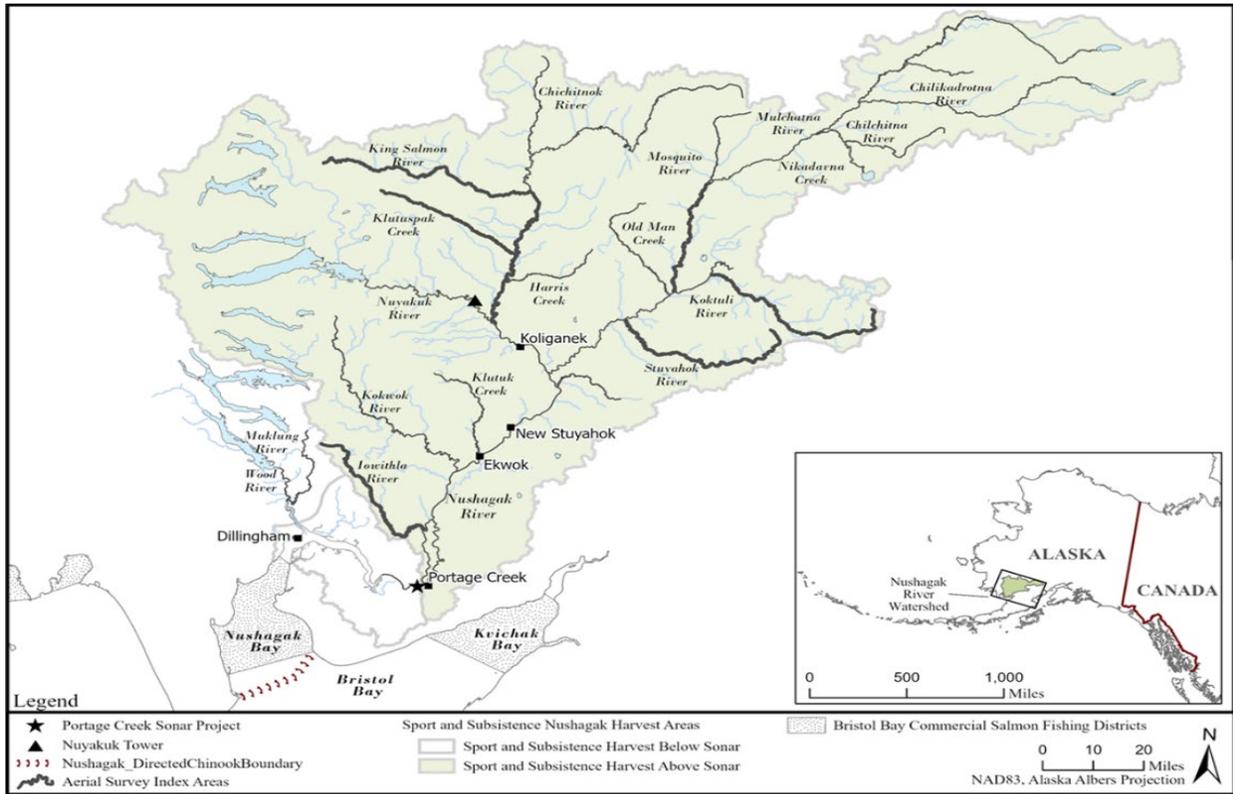


Figure 61-2.—Map of the Nushagak River Drainage, assessment projects, and harvest areas.

Table 61-1.—King salmon harvest, escapement and total runs in the Nushagak River, in numbers of fish, Bristol Bay, 2004–2025.

Year	Harvests by fishery			Total	Inriver abundance ^c	Spawning escapement ^d	Total run
	Commercial ^a	Sport	Subsistence ^b				
2004	100,846	6,906	15,066	122,818	242,183	233,422	356,240
2005	62,764	8,565	12,422	83,751	234,123	223,950	307,701
2006	84,881	7,473	9,143	101,497	124,683	117,364	218,861
2007	51,831	9,669	12,975	74,475	60,459	50,960	125,435
2008	18,968	6,700	11,720	37,388	97,330	91,364	128,752
2009	24,693	6,354	12,108	43,155	81,480	74,781	117,936
2010	26,056	3,907	8,190	38,153	60,185 ^e	56,092	94,245
2011	26,927	4,844	11,466	43,237	108,278 ^e	101,995	145,232
2012	11,952	5,931	9,634	27,517	174,085 ^e	167,589	195,106
2013	10,213	6,685	11,090	27,988	113,709	104,794	132,782
2014	11,868	6,260	15,832	33,960	70,460	62,679	96,639
2015	50,675	7,234	11,714	69,623	98,019	91,090	160,713
2016	24,937	8,411	16,115	49,463	125,368	118,077	167,540
2017	33,376	5,671	10,739	49,786	56,961	52,297	102,083
2018	36,626	8,192	11,835	56,653	97,239	91,354	148,007
2019	22,725	6,306	10,129	39,160	46,763	41,258	80,418
2020	7,452	1,950	8,253	17,655	43,032	40,313	57,968
2021	4,820	2,926	5,648	13,394	55,222	52,119	65,513
2022	5,431	3,658	4,677	13,766	44,434	40,334	54,187
2023	6,849	2,447	3,260	12,556	31,499	28,826	41,382
2024	3,259	2,843	3,121	9,223	41,893	38,342	47,565
2025	3,534	2,983 ^f	3,941 ^f	10,458	34,322	30,881	41,339
2004–22 Avg.	32,476	6,192	10,987	49,655	101,790	95,360	145,019
15–24 Avg.	19,615	4,964	8,549	33,128	64,043	59,401	92,538

^a Commercial harvest includes personal use reported from commercial harvest and fish caught in test fisheries.

^b Subsistence harvest is intended to represent Nushagak River bound king salmon. It excludes upper Wood River and Igushik harvest.

^c Inriver abundance estimated by sonar below the village of Portage Creek. Estimates prior to 2006 were adjusted after the 2012 season to account for a transition in sonar technology that occurred in 2006 (Buck et al 2012).

^d Spawning escapement estimated from inriver abundance estimated by sonar minus inriver sport and subsistence harvests above the sonar.

^e Revised passage estimates for 2010, 2011, and 2012 are 60,185, 108,278, and 174,085 respectively.

^f Data not available at the time of publication. Three-year average used.

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

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

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

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

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

PROPOSAL 62 – 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Kent Anderson, owner Alaska Salmon Camp, Inc.

WHAT WOULD THE PROPOSAL DO? Prohibit commercial fishing in the Nushagak District with drift gillnets and in the Nushagak Section with set gillnets until June 28 unless the king salmon count at the sonar near Portage Creek has exceeded 55,000.

WHAT ARE THE CURRENT REGULATIONS? There are 3 triggers that open commercial fishing in the Nushagak District. These triggers are calculated annually based on the forecast as follows:

- 1) The Nushagak River salmon sonar count in the is projected to exceed 6% of the sockeye salmon forecast.
- 2) The Wood River salmon count is projected to exceed 10% of the sockeye salmon forecast.
- 3) The commercial fishery opens June 28 at 9:00 AM if neither trigger 1 nor 2 above are met.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The commercial salmon fishery in the Nushagak District would be closed until June 28 or until 55,000 king salmon are counted at the Portage Creek sonar. Commercial salmon harvest for all species would likely decrease, and inriver salmon abundance would likely increase. The subsistence fishery would not be affected because the department opens it on June 1 and keeps it open until just prior to the first commercial fishing period.

BACKGROUND: See background for Proposal 61.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The current king salmon stock of concern action plan uses sockeye salmon triggers to balance king salmon conservation and sockeye salmon harvest potential. This approach was implemented, in part, because inseason abundance estimates of king salmon at the Nushagak River sonar are highly uncertain, particularly in years of high sockeye salmon inriver abundance. The current sockeye salmon triggers in the king salmon stock of concern action plan have resulted in foregone sockeye salmon harvest and may have increased inriver abundance of Nushagak River king salmon. Current harvest reporting and inriver estimates allow fine-scale, abundance-based harvest management. Abundance-based fishery management adjusts harvest levels in real time based on the size of returning salmon runs. This long-standing department approach allows for sustainable fishing by maximizing the probability escapement goals are met to maintain healthy fish populations, while maximizing harvest opportunities at all levels of salmon abundance.

Basing commercial fishing opportunity on sockeye salmon abundance rather than king salmon abundance as the primary tool for king salmon rebuilding has been controversial, because rebuilding king salmon becomes secondary to sockeye salmon harvest opportunity once the trigger is met. Alternatively, this proposal uses metrics based on historic king salmon run timing or a fixed escapement level to pass king salmon through the commercial fishery before full scale commercial operations for sockeye salmon begin. However, opening the fishery on a fixed date reduces the

department's ability to respond to inseason estimates of run abundance, of sockeye salmon, and may also result in increased inriver abundance of all salmon.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 63 – 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Nicholas Dowie, John O’Connor

WHAT WOULD THE PROPOSAL DO? This would prohibit retention of king salmon 28 inches or greater in length until 70,000 king salmon are counted inriver and establish sport fishing closures based on tides. It would also require that annual harvests of king salmon be submitted to the department.

WHAT ARE THE CURRENT REGULATIONS? From May 1-July 31, only one single-hook lure or fly, or one single-hook may be used. For king salmon 20 inches or longer, there is a limit of 2 per day, 2 in possession, only 1 of which may be 28 inches or longer. After taking a bag limit of king salmon 20 inches or longer from the Nushagak/Mulchatna River Drainage, you may only use one unbaited, single-hook, artificial lure or fly in the Nushagak/Mulchatna River Drainage for the remainder of the day. There is an annual limit of 4 king salmon over 20 inches taken from the entire Nushagak/Mulchatna Drainage, only 1 of which may be 28 inches or longer. All sport harvested king salmon 20 inches or longer must be recorded. For king salmon less than 20 inches in length, 5 per day and 5 in possession. From the Nushagak River’s confluence with the Iowithla River, upstream to Harris Creek, including the Iowithla River, May 1-July 24 is open to king salmon fishing. Upstream of the Nushagak River’s confluence with Harris Creek is closed year-round to king salmon fishing and only unbaited, single-hook, artificial lures may be used year-round.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The Nushagak River king salmon sport fishery would begin the season under a non-retention restriction for fish larger than 28 inches that would be rescinded when 70,000 king salmon are counted on the sonar at Portage Creek. At this point an emergency order would be issued to allow retention of fish greater than 28 inches in length as well as a fishing closure schedule that would be linked to the tides. The unpredictable start date for retention of fish over 28 inches in length may create instability in the sport fishery. It would also require the department to collect and analyze harvest records for king salmon, which would require additional staff and/or staff time.

BACKGROUND: Based on statewide harvest survey (SWHS) data, sport fishing effort in the Nushagak River Drainage from 2020–2024 has ranged from a high of 14,741 angler days in 2021 to a low of 4,902 angler days in 2020, with an average of 10,912 angler days. King salmon sport harvest during this time period has ranged from a high of 3,658 in 2022 to a low of 1,950 in 2020, with an average of 2,765 fish (Table 63-1). At the 2022 Board of Fish meeting, Nushagak River king salmon were designated as a stock of management concern, and during the 2023 statewide Board of Fish meeting, the *Nushagak District King Salmon Stock of Concern Management Plan* was adopted, outlining the methods by which each user group would contribute to the stock being rebuilt. A restriction on retention was placed on the sport fishery, reducing the annual number of fish over 28 inches in length that could be retained from 4 fish to 1 fish. There have been 2 instances of 70,000 fish being counted at the sonar in the past 10 years. In 2016, this was achieved on June 20, and in 2018, it was achieved on July 3.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. An unpredictable start date for retention of king salmon 28 inches or greater in length coupled with daily closures based on tides would create uncertainty for anglers. Adoption of this proposal would deviate from areawide regulations and may reduce the recreational benefit and economic potential of the fishery with minimal conservation benefit. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would result in additional direct costs for the department.

Table 63-1.–Nushagak River King salmon harvest and escapement, above and below the sonar site, 2003–2025.^a

Year	Total Run	Harvests Below Sonar			Inriver Sonar Estimate	Harvests Above Sonar		Spawning Escapement	Total Harvest
		Commercial	Subsistence	Sport		Subsistence	Sport		
2003	225,594	43,485	13,399	2,203	166,507	4,448	3,752	158,307	67,287
2004	356,240	100,846 ^b	10,644	2,567	242,183	4,422	4,339	233,422	122,818
2005	307,701	62,764	7,951	2,863	234,123	4,471	5,702	223,950	83,751
2006	218,861	84,881	6,131	3,166	124,683	3,012	4,307	117,364	101,497
2007	125,435	51,831	9,564	3,581	60,459	3,411	6,088	50,960	74,475
2008	128,752	18,968	9,149	3,305	97,330	2,571	3,395	91,364	37,388
2009	117,936	24,693	9,312	2,451	81,480	2,796	3,903	74,781	43,155
2010	94,245	26,056	6,345	1,659	60,185	1,845	2,248	56,092	38,153
2011	145,232	26,927	8,485	1,542	108,278	2,981	3,302	101,995	43,237
2012	195,106	11,952	7,236	1,833	174,085	2,398	4,098	167,589	27,517
2013	132,782	10,213	6,889	1,971	113,709	4,201	4,714	104,794	27,988
2014	96,639	11,868	11,942	2,369	70,460	3,890	3,891	62,679	33,960
2015	160,713	50,675	9,505	2,514	98,019	2,209	4,720	91,090	69,623
2016	167,540	24,937	14,182	3,053	125,368	1,933	5,358	118,077	49,463
2017	102,083	33,376	8,912	2,834	56,961	1,827	2,837	52,297	49,786
2018	148,007	36,626	10,427	3,715	97,239	1,408	4,477	91,354	56,653
2019	80,418	22,725	7,162	3,768	46,763	2,967	2,538	41,258	39,160
2020	57,968	7,452	5,988	1,496	43,032	2,265	454	40,313	17,655
2021	65,513	4,820	3,904	1,567	55,222	1,744	1,359	52,119	13,394
2022	54,867	5,431	3,043	1,279	44,434	1,634	2,379	40,334	14,533
2023	41,382	6,849	1,816	1,218	31,499	1,444	1,229	28,826	12,556
2024	47,565 ^c	3,259	1,293 ^c	1,120	41,893	1,828 ^c	1,723	38,342 ^c	9,223 ^c
2025	41,339 ^c	3,534 ^c	2,277 ^d	1,206 ^d	34,322	1,664 ^d	1,777 ^d	30,881 ^c	10,458 ^c
Average 20 Year (2003- 2022)	149,082	33,026	8,509	2,487	105,026	2,822	3,693	98,507	50,575
2017-2022	84,809	18,405	6,573	2,443	57,275	1,974	2,341	52,946	31,864
2023-2025	43,429	4,547	1,795	1,272	35,905	1,645	1,576	32,683	10,746

Note: Subsistence harvest is a subset of the total Chinook salmon harvest in the Nushagak Bay reporting area and attempts to only account for Nushagak River bound Chinook salmon. Harvest within the Igushik, Snake, and Wood Rivers (Above Red Bluff) are not included in this table. As a result, Subsistence harvest numbers from this table may not match up with other subsistence harvest estimates for the area as a whole.

^a Source: 1992–2011 Buck et al 2012,

2012-2025 Personal Communication Cole Weaver (Data prepared for 2026 Board of Fish)

^b Commercial Harvest includes harvest of 4,087 Chinook salmon that were caught in General District 320-05 as they are most likely of Nushagak origin. (Buck et al 2012)

^c Preliminary Estimate

^d Preliminary Estimate - 3-year average.

PROPOSAL 64 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan, and 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Rick Tennyson.

WHAT WOULD THE PROPOSAL DO? Allow for the opening of the Wood River Special Harvest Area (WRSHA) to harvest surplus Wood River sockeye salmon, while the broader Nushagak District would remain closed for king salmon conservation.

WHAT ARE THE CURRENT REGULATIONS? The WRSHA may open to commercial fishing when the escapement of sockeye salmon into the Wood River exceeds 1,100,000 and the escapement is projected to exceed 1,400,000 fish (5 AAC 06.358(c)(3)). The gear group behind in allocation has access to the WRSHA when opened under 5 AAC 06.358(c)(3).

Under the *Nushagak District King Salmon Stock of Concern Management Plan*, one of the triggers for opening the Nushagak District before June 28 is projecting 10% of the forecasted Wood River sockeye salmon escapement past the Wood River Tower.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would provide the department with the authority to open the Wood River Special Harvest Area (WRSHA) earlier in the season, independent of the triggers in the *Nushagak District King Salmon Stock of Concern Management Plan*. This would likely be delayed when the Wood River escapement trigger in that plan is achieved, which may delay commercial fishing in the broader district. This may also decrease the time spent fishing in the WRSHA later in the season.

BACKGROUND: The *Nushagak District King Salmon Stock of Concern Management Plan* prohibits opening the Nushagak District commercial fishery until one of three triggers is met. One of these is the passage of 10% of the forecasted total Wood River sockeye salmon run past the Wood River tower. For the past 3 years, with forecasts of around 8 million fish, this trigger has been 800,000 fish past the tower. However, this does not account for the substantial number of fish between the district and the tower, which can sometimes be enough to meet the 1.1 million threshold required to open the Wood River Special Harvest Area (WRSHA) under its own management plan. Once the WRSHA Plan goes into effect at the 1.1 million fish threshold, it remains open for the remainder of the season.

In the past 3 years, the Wood River sockeye salmon escapement past the Wood River Tower has reached 1 million fish around June 25 (Figure 64-1). The fishery was opened on June 27 in 2023 and 2025, and June 29, 2024. During those same years, the average final escapement was 3.24 million fish. Considering that the upper end of the Wood River SEG is 1.8 million, this represents an average of 1.4 million annual foregone sockeye salmon harvest. While there is some harvest of king salmon in the WRSHA (Table 58-1), the level of harvest would be contingent upon whether fishing time in the WRSHA was reduced or expanded.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. Opening the WRSHA is an option that has been used in the past to harvest surplus Wood River sockeye salmon while reducing harvest pressure on salmon stocks returning to the Nushagak

River. King salmon, some of which are likely of Nushagak River origin, are harvested in WRSHA. Increasing the frequency of WRSHA openings would likely increase harvest of Nushagak River king salmon, and in some instances, it would facilitate the harvest of surplus Wood River sockeye salmon and would increase the department's ability to achieve the Wood River sockeye salmon OEG.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

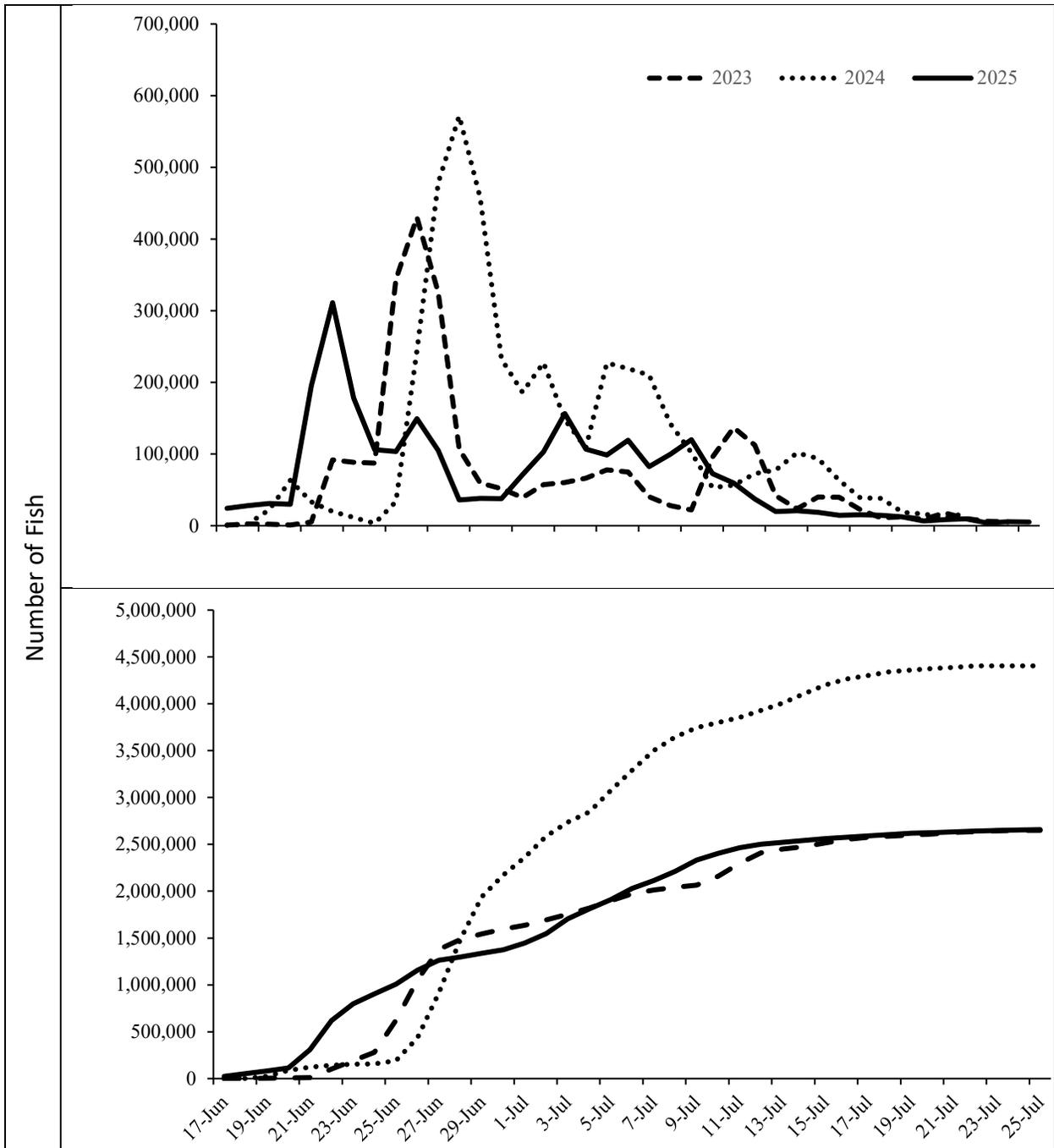


Figure 64-1.—Daily (top panel) and cumulative (bottom panel) of sockeye salmon past the Wood River Tower (2023–2025).

PROPOSAL 65 – 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan, and 5 AAC 06.367, and Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Alaska’s Best Seafood.

WHAT WOULD THE PROPOSAL DO? Fish harvested in the Wood River Special Harvest Area (WRSHA) would not be included in the *Nushagak District Allocation Plan*. It would also change the triggers in the *Nushagak District King Salmon Stock of Concern Management Plan* such that the set gillnet fishery in the Nushagak District has a less restrictive set of triggers for opening than the drift gillnet fishery.

WHAT ARE THE CURRENT REGULATIONS? When the WRSHA is open, the harvest is included in the district harvest by gear type used to calculate harvest percentages. Commercial fishing with set and drift gillnet gear in the Nushagak Section of the Nushagak District is not allowed until the Wood River or Nushagak River triggers are met or after 9:00 a.m. on June 28.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the change in allocation component of this proposal were adopted, the harvest of sockeye salmon in the WRSHA would likely decrease. This change would require the department to manage for a separate allocation goal. Presumably, the 3 drift to 1 set gillnet opening allocation currently in effect under other WRSHA situations would be applied. Although initial interest in fishing in the WRSHA by the drift fleet would be high, it would likely decrease as district harvest rates increase. This would leave little effort by the drift fleet in the WRSHA after a few days. In the past, industry has also struggled to provide tender support to both the WRSHA and the main district during the peak of the season. This combination, along with necessary closures to transition between gear types, would likely result in minimal drift gillnet effort in the WRSHA for many openings and additional foregone harvest.

If gear type-specific triggers were established, the set gillnet fleet would have additional opportunities during the early portion of the run before the drift gillnet trigger was met. This would likely increase king and sockeye salmon harvest.

BACKGROUND: The WRSHA was originally established to allow concurrent commercial openings for both gear types without additional allocation considerations. In 2004, the management plan was revised to prohibit WRSHA openings when the regular commercial fishing district was open. Following the record sockeye salmon run in 2006, which saw over 4 million fish escape into the Wood River, the plan was revised again in 2009 to allow concurrent openings if escapement past the Wood River tower exceeded 1.1 million fish and was projected to surpass 1.4 million. Additionally, the commercial salmon fishery in the WRSHA may be opened only during closures of the subsistence salmon fisheries within the Wood River Special Harvest Area.

In 2010, the first year under the new regulation, drift gillnet harvest and effort exceeded that of the set gillnet fleet (Table 59-1); however, since then—except in 2020, when only the drift gillnet fleet had access—the set gillnet fleet has generally been dominant in both effort and harvest (Table 59-1). In 2012, the board amended the WRSHA plan again to require separate openings for each gear

type, following the model used in the Naknek River Special Harvest Area (NRSHA). Current regulations state that any fish harvested in the WRSHA, when opened to target surplus escapement, must be counted toward the regular Nushagak District allocation.

The triggers for the king salmon stock of concern plan were developed in March 2023 and have been in use for three seasons. The triggers have delayed fishing in the Nushagak District by 2-5 days each season, providing additional time for king salmon to pass through the district (Table 61-2). There was no consideration for having gear-type-specific triggers.

Historically, in the Nushagak District, the set gillnet fleet would fish first when it appeared that sockeye salmon escapement was increasing. The department would typically wait until 100,000 sockeye salmon were projected to have passed the Wood River sonar tower before allowing commercial fishing to begin. Set gillnets would then be used as an indicator of run entry, usually fishing for one to three tides. However, under the new king salmon management plan, more escapement, based on triggers, is allowed before commercial fishing begins. As a result, by the time the fishery opens, a greater portion of the sockeye salmon run has already passed, eliminating the utility of using set gillnet harvest as an indicator of run entry. Recently, both set and drift gillnet gear types have begun fishing on the same tide, leading to far more overlap between the fleets than in the past.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because it will reduce the department's ability to manage for sockeye salmon escapement and may increase king salmon harvest. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 66 – 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Travis Wren

WHAT WOULD THE PROPOSAL DO? This would prohibit the use of bait and barbed hooks by sport anglers in the Nushagak River Drainage and define only 4 specific legal types of terminal tackle for king salmon within the *Nushagak District King Salmon Stock of Concern Management Plan*. One plug with a single barbless hook, one spoon with a single barbless hook, one spinner with a single barbless hook, and one artificial fly with a single barbless hook.

WHAT ARE THE CURRENT REGULATIONS? There are no regulations requiring barbless hooks for finfish in the state of Alaska. From May 1–July 31, only one single-hook lure or fly, or one single-hook may be used. For king salmon 20 inches or longer, the limit is 2 per day, 2 in possession, only 1 of which may be 28 inches or longer. After taking a bag limit of king salmon 20 inches or longer from the Nushagak/Mulchatna River Drainage, you may only use one unbaited, single-hook, artificial lure or fly in the Nushagak/Mulchatna River Drainage for the remainder of the day. There is an annual limit of 4 king salmon over 20 inches taken from the entire Nushagak/Mulchatna Drainage, only 1 of which may be 28 inches or longer. All harvested king salmon 20 inches or longer must be recorded. For king salmon less than 20 inches in length, the limit is 5 per day, 5 in possession. From the Nushagak River’s confluence with the Iowithla River, upstream to Harris Creek, including the Iowithla River, May 1–July 24 is open to king salmon fishing. Upstream of the Nushagak River’s confluence with Harris Creek, closed year-round to king salmon fishing and only unbaited, single-hook, artificial lures may be used year- round.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would result in decreased catch rates for anglers, increased regulatory complexity, and would prohibit tackle commonly used by anglers. This may also reduce catch-and-release mortality by an unknown amount.

BACKGROUND: See proposal 63 background. Based on SWHS data, sport fishing effort in the Nushagak River Drainage 2020–2024 has ranged from a high of 14,741 angler days in 2021 to a low of 4,902 angler days in 2020 with an average of 10,912 angler days. King salmon sport harvest during this time period has ranged from a high of 3,658 in 2022 to a low of 1,950 in 2020, with an average of 2,765 fish (Table 63-1). There is no statistically significant effect on mortality from the use of bait on king salmon caught and released in the Nushagak king salmon sport fishery (Borden and Dye 2025). Bait is already prohibited in sensitive spawning areas and after a bag limit of fish 20 inches or greater in length has been kept. At the 2022 Board of Fish meeting Nushagak king salmon were designated as a stock of management concern and during the 2023 statewide board meeting the *Nushagak District King Salmon Stock of Concern Management Plan* was adopted outlining the methods by which each user group would contribute to the stock being rebuilt. A restriction on retention was placed on the sport fishery reducing the annual number of fish over 28 inches in length that could be retained from 4 fish to 1 fish. The Idaho Fish and Game study by Schill and Scarpella (1997) reviewed extensive data across multiple fisheries and found no statistically significant difference in hooking mortality between barbed and barbless hooks, with mortality rates averaging 4.5% and 4.2% respectively. The authors concluded that barbed hooks do not pose a measurable biological disadvantage to fish populations. In more recent studies

(Courter et al. 2023; Prystay et al. 2025; FSA23-01 Staff Analysis 2023), barbless hooks have been shown to decrease tissue damage and reduce handling and unhooking time, however the difference in catch-and-release mortality between barbed and barbless hooks is typically minimal. The difference is often less than a few percentage points for trout and Pacific salmon when artificial lures or flies are used.

Since the adoption of the *Nushagak District King Salmon Stock of Concern Management* plan in 2023 the department has taken conservative action in the sport fishery through emergency orders restricting bag limits and prohibiting retention and the use of bait. On July 7 in 2023 the bag and possession limits for fish over 20” was reduced to one per day, one in possession and the annual limit was reduced to two fish. On July 13 retention of all king salmon and the use of bait was prohibited. On July 3 in 2024 retention of all king salmon and the use of bait was prohibited. On July 7 in 2025 the bag and possession limits for fish over 20” was reduced to one per day, one in possession and the annual limit was reduced to two fish.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. There is currently no biological or conservation concern specifically related to the use of barbed hooks. The department has the authority to issue an emergency order prohibiting the use of bait during low runs and has done so in years when retention is prohibited via emergency order. In fisheries where harvest is allowed, barbless hooks would negatively affect an angler’s ability to harvest fish. Barbless hook regulations may disproportionately affect inexperienced and youth anglers. Adoption of this proposal would deviate from areawide regulations and increase regulatory complexity with no measurable conservation benefit. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Adoption of this proposal may result in an additional direct cost for anglers that would need to purchase new tackle or modify existing tackle in order to participate in the fishery. Approval of this proposal is not expected to result in additional direct costs for the department.

PROPOSAL 67 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Susie Brito, Tom O’Connor

WHAT WOULD THE PROPOSAL DO? This would prohibit sport retention of king salmon, and the use of bait on the Nushagak River, as well as close the Stuyahok and Mulchatna rivers to king salmon sport fishing until the lower end of the escapement goal has been met (Figure 67-1).

WHAT ARE THE CURRENT REGULATIONS? From May 1–July 31, only one single-hook lure or fly, or one single-hook may be used. For king salmon 20 inches or longer, the limit is 2 per day, 2 in possession, only 1 of which may be 28 inches or longer. After taking a bag limit of king salmon 20 inches or longer from the Nushagak/Mulchatna River Drainage, you may only use one unbaited, single-hook, artificial lure or fly in the Nushagak/Mulchatna River Drainage for the remainder of the day. There is an annual limit of 4 king salmon over 20 inches taken from the entire Nushagak/Mulchatna Drainage, only 1 of which may be 28 inches or longer. All harvested king salmon 20 inches or longer must be recorded. For king salmon less than 20 inches in length, the limit is 5 per day, 5 in possession. From the Nushagak River’s confluence with the Iowithla River, upstream to Harris Creek, including the Iowithla River, May 1–July 24 is open to king salmon fishing. Upstream of the Nushagak River’s confluence with Harris Creek, the river is closed year-round to king salmon fishing and only unbaited, single-hook, artificial lures may be used year- round.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, the Nushagak River king salmon sport fishery would begin the season under emergency order restriction prohibiting retention of king salmon that would not be rescinded until the escapement goal for king salmon is met. The historical date on which escapement has been achieved is often at the point when effort is leaving the river. If this is added to (5 AAC 67.022) then this restriction would remain in effect even if the stock recovers and is taken out of stock of concern status.

BACKGROUND: See proposal 63 background. Based on SWHS data, sport fishing effort in the Nushagak River Drainage from 2020–2024 has ranged from a high of 14,741 angler days in 2021 to a low of 4,902 angler days in 2020, with an average of 10,912 angler days. King salmon sport harvest during this time period has ranged from a high of 3,658 in 2022 to a low of 1,950 in 2020, with an average of 2,765 fish (Table 61-1). Sport fishing effort on the Stuyahok River is very low, and most years, there are no responses to the SWHS of anglers that fished the river. The most recent year that there was data for Stuyahok was 2020, in which there were 67 angler days, and 0 king salmon harvested. Angler effort on the Stuyahok is likely near or below 100 angler days annually, with minimal or no king salmon harvest. The majority of effort on the Stuyahok is directed towards species other than king salmon. Sport fishing effort in the Mulchatna River, from 2020-2024 has ranged from a high of 1,575 angler days in 2024 to a low of 837 angler days in 2020 with an average of 1,165 angler days. The majority of sport effort on the Mulchatna is directed towards species other than king salmon. King salmon sport harvest during this time period has ranged from a high of 237 in 2022 to a low of 0 in 2023 and 2024 with an average of 86 fish. At the 2022 Board of Fisheries meeting, Nushagak king salmon were designated as a stock of management concern, and during the 2023 statewide Board of Fisheries meeting the *Nushagak District King Salmon Stock of Concern Management Plan* was adopted, outlining the methods by

which each user group would contribute to the stock being rebuilt. A restriction on retention was placed on the sport fishery, reducing the annual number of fish over 28 inches in length that could be retained from 4 fish to 1 fish. There have only been 3 instances of 55,000 fish being counted at the sonar in the past 10 years. In 2016, this was achieved on June 18, in 2017, this was achieved on July 12, and in 2018, it was achieved on June 28.

Since the adoption of the *Nushagak District King Salmon Stock of Concern Management Plan* in 2023, the department has taken conservative action in the sport fishery through emergency orders restricting bag limits and prohibiting retention and the use of bait. On July 7 in 2023 the bag and possession limits for fish over 20” was reduced to one per day, one in possession and the annual limit was reduced to two fish. On July 13 retention of all king salmon and the use of bait was prohibited. On July 3 in 2024 retention of all king salmon and the use of bait was prohibited. On July 7 in 2025 the bag and possession limits for fish over 20” was reduced to one per day, one in possession and the annual limit was reduced to two fish.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. An unpredictable start date for retention and area closures that would be lifted inseason may create uncertainty for anglers and commercial sport fishing operators. Adoption of this proposal would deviate from areawide regulations, increase regulatory complexity, and reduce the recreational benefit and economic potential of the fishery with minimal conservation benefit. The department has the authority to issue an emergency order prohibiting the use of bait during low runs and has done so in years when retention is prohibited via emergency order. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in additional direct cost for the department.

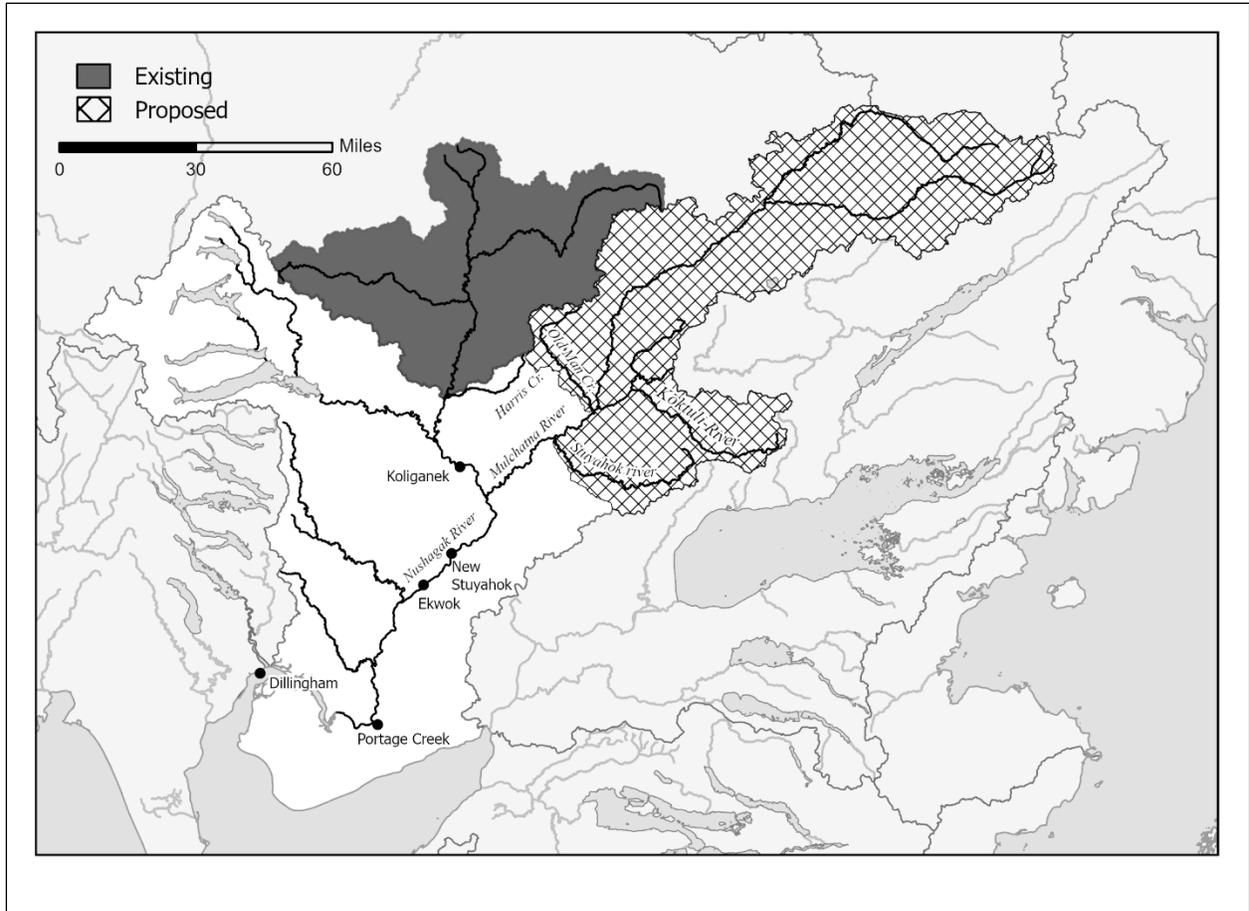


Figure 67-1.—Area proposed for non-retention of king salmon until the lower end of the escapement goal has been achieved, outlined with cross-hatching, and area in grey showing existing year-round closure to fishing for king salmon.

PROPOSAL 68 – 5 AAC 06.361 Nushagak-Mulchatna King Salmon Management Plan, and 5 AAC 06.391 Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Justin Crump.

WHAT WOULD THE PROPOSAL DO? Create an Optimal Escapement Goal (OEG) for Nushagak River king salmon that would result in a spawning escapement range of 102,530 to 119,882 fish resulting from a sonar count of 59,467 to 69,532 fish.

WHAT ARE THE CURRENT REGULATIONS? The department manages the commercial, sport, and subsistence fisheries in the Nushagak District to achieve an inriver goal of 95,000 king salmon, and the inriver run goal provides for a biological escapement goal of 55,000–120,000 fish.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is unclear what effect this would have on management should it be adopted. The proposed OEG has a similar lower end to the current escapement goal range but a much narrower overall range. This could increase the king salmon commercial harvest once the lower end of the escapement goal range is achieved, as management would attempt to control king salmon escapement to avoid going over the upper end of this OEG.

It is unclear what additional changes to the *Nushagak District King Salmon Stock of Concern Management Plan* will be implemented to provide guidance to the department in managing the Nushagak District commercial fisheries in relation to the proposed OEG.

BACKGROUND: See background for proposal 61.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because it would lower the upper end of the escapement goal range from 120,000 to 70,000. This proposed upper limit is below the current inriver goal of 95,000, which would create a management conflict. If the king salmon population were to rebound, the department would be expected to manage to ensure escapement levels do not exceed 70,000 fish. The department is **NEUTRAL** on the allocative aspects of this proposal. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)

3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

PROPOSAL 69 – 5 AAC 06.391. Nushagak District King Salmon Stock of Concern Management Plan.

PROPOSED BY: Kenai River Sportfishing Association.

WHAT WOULD THE PROPOSAL DO? Define in regulation a recovery goal for Nushagak River King Salmon as follows:

WHAT ARE THE CURRENT REGULATIONS? There is no regulation that provides recovery goals or criteria for removing stock of concern designation for the Nushagak River king salmon stock of concern, but criteria for removing the stock of concern designation were included in the department action plan and adopted by the board in March 2023.

The provisions of this management plan are in effect until the lower bound of the SEG (55,000): (1) is met or exceeded in 3 consecutive years and is expected to be met in future years; or (2) is met in 4 out of 6 consecutive years and is expected to be met in future years.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The specific goals for when Nushagak River king salmon would no longer be considered a stock of concern would be the same as those included in the department action plan adopted by the board in March 2023, except there are no criteria for relaxing restrictions.

BACKGROUND: At the March 10, 2023, statewide finfish meeting, the board approved the department’s Nushagak River King Salmon Action Plan with the following amendments: RC 53 was adopted as a substitute for the proposed actions in the subsistence, sport, and commercial fisheries. The board further clarified they would retain the criteria from the Action Plan, rather than placing criteria for removal of stock of concern designation in the regulatory language of RC 53.

The criteria from the Action Plan referenced on record by the board are as follows:

CONDITIONS FOR DELISTING A STOCK OF CONCERN

The Policy for the Management of Sustainable Salmon Fisheries defines “management concern” as “a concern arising from a chronic inability, despite the use of specific management measures, to maintain escapements for a salmon stock within the bounds of the SEG, BEG, OEG, or other specified management objectives for the fishery.” The stock of management concern for this stock is unusual as it is based on ‘other specified management objective’ - the inriver goal and not the escapement goal. Inriver abundance and escapement are estimated from the sonar assessment. That assessment is known to have poor accuracy as a king salmon counting tool with 45–60% of king salmon migrating beyond the area of the river where sonar can reach. Because of that, there is low confidence in the accuracy of the king salmon inriver abundance estimate. Additionally, king salmon production levels have declined. King salmon productivity has declined to the point where the total king salmon run is less than the 95,000 fish inriver goal in four of the past 10 years. In those years even if there had been no harvest by any user groups the inriver goal would remain unattainable. However, the department does not have biological sustainability concerns for this stock because escapement levels have been at or near lower

end of SEG given assessment uncertainty. The inriver goal of 95,000 was established during a period of higher king salmon productivity. The 95,000 inriver fish goal includes the 55,000 low end of the SEG and provides for reasonable opportunity for sport and subsistence fisheries with recent 10-year (2013–2022) average harvests of 11,000 subsistence and 6,000 sport king salmon harvest. The board may want to revisit the inriver goal to determine if it remains appropriate for current lower production regime and recognizing the uncertainty associated with the assessment. Because of these issues the department recommends using the lower bound of the escapement goal as the metric for getting out of stock of management concern status. This allows for static inriver subsistence and sport harvests and achieves the SEG but recognizes the lower productivity regime that currently exists.

1. Delisting - If the lower bound of the SEG is met or exceeded in three consecutive years and is expected to meet the goal range in the future years or is met in four out of six consecutive years and is expected to meet the goal range in future years, the department will recommend removing Nushagak River king salmon as a stock of management concern at the first Bristol Bay board meeting after this condition is met.
2. Restrictions - Management restrictions may be relaxed based on king salmon run timing and if catch and harvest data indicate restrictions are no longer needed to ensure the escapement goal is met.
3. Restrictions - If two consecutive years of escapement are near or above the upper bound of the escapement goal range, management restrictions may be relaxed or set aside using EO authority.

The report goes on to state, “Stock status, action plan performance (including information on harvest rate, distribution, and timing in fisheries), and the results of the escapement goal review will be updated in a report to the board at the 2025 Bristol Bay meeting.” This can be found in the Nushagak king salmon stock status written report.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. To meet the board’s statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.

4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.

5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

WESTSIDE MANAGEMENT (7 PROPOSALS)

PROPOSAL 58 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Frank Woods.

WHAT WOULD THE PROPOSAL DO? Increase the trigger that allows opening the Wood River Special Harvest Area (WRSHA) to commercial harvest of surplus Wood River sockeye salmon when the total run is estimated to be greater than 5 million fish.

WHAT ARE THE CURRENT REGULATIONS? The WRSHA may open to commercial harvest when the escapement of sockeye salmon into the Wood River exceeds 1,100,000 and is projected to exceed 1,400,000 fish (5 AAC 06.358(c)(3)).

The *Nushagak River King Salmon Stock of Concern Management Plan* established an OEG for Wood River sockeye to ensure protection of weaker Nushagak salmon stocks as they pass through the regular commercial fishing district.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce the department's ability to manage escapement in the Wood River system and would likely result in increased salmon escapement. Some king salmon of unknown origin are harvested in the WRSHA, and some of those fish may be from the Nushagak River (Table 58-1). Reducing fishing time will likely result in less commercial harvest of king salmon.

BACKGROUND: The Wood River Special Harvest Area (WRSHA) management plan was first adopted in 1995. In 2004, it was amended to prohibit openings in the WRSHA when the regular commercial fishing district was open. This regulation was revised again in 2009, following the record sockeye salmon run of 2006, during which more than 4 million fish escaped into the Wood River. This revision allowed commercial fishing for both gear types in the WRSHA, provided 2 conditions were met: 1.1 million sockeye salmon had passed the Wood River counting tower, and escapement was projected to exceed 1.4 million fish. This management trigger has remained in place since then. Additionally, the commercial salmon fishery in the WRSHA may be opened only during closures of the subsistence salmon fisheries within the Wood River Special Harvest Area. The WRSHA plan was amended again in 2012 to disallow concurrent gear openings in the WRSHA. Because concurrent gear openings are not allowed when the WRSHA is opened under the provision to harvest surplus Wood River sockeye salmon, the WRSHA harvest is tabulated with the harvest from the commercial district. Fishing opportunity is given to the gear type that is behind based on that tabulation. Since 2017, the WRSHA has opened annually under the provision to harvest sockeye salmon surplus to escapement needs in the Wood River. From 2017 to 2025, the average annual harvest in the WRSHA was approximately 530,000 sockeye salmon. Over the same period, the average Wood River escapement was 3.77 million fish. The lowest escapement occurred in 2019, with 2.07 million fish—still well above the upper end of the Wood River escapement goal range, which is 1.8 million. The last time escapement fell within the goal range was in 2016.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Opening the WRSHA is an option that has been used in the past to harvest surplus Wood River sockeye salmon

while reducing harvest pressure on salmon stocks returning to the Nushagak River. King salmon, some of which are likely of Nushagak River origin, are harvested in WRSHA. Reducing the frequency of WRSHA openings would likely conserve a small number of Nushagak River king salmon.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 58-1.—Sockeye and king salmon harvest by gear group in the WRSHA (2010–2025).

Year	Harvest			
	Sockeye		King	
	Set	Drift	Set	Drift
2010	336,760	794,481	207	171
2011			Not opened	
2012	131,162	137,150	107	136
2013			Not opened	
2014	234,798	51,501	596	48
2015			Not opened	
2016			Not opened	
2017	474,387	–	1,160	–
2018	848,961	–	274	–
2019	245,594	–	157	–
2020	–	228,149	–	18
2021	604,344	–	117	–
2022	690,818	–	254	–
2023	446,708	177,508	22	9
2024	611,570	–	48	–
2025	570,955	–	133	–

PROPOSAL 59 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan, and 5 AAC 06.367. Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Leo Jennings.

WHAT WOULD THE PROPOSAL DO? Require fishing opportunity in the Wood River Special Harvest Area (WRSHA) for both set and drift gillnet gear types when the WRSHA is opened to harvest surplus Wood River sockeye salmon.

WHAT ARE THE CURRENT REGULATIONS? The WRSHA may open when the escapement of sockeye salmon into the Wood River exceeds 1,100,000, and the escapement is projected to exceed 1,400,000 fish (5 AAC 06.358(c)(3)). The gear group behind in allocation has access to the WRSHA when opened under (5 AAC 06.358(c)(3)).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This may reduce the department's ability to manage for escapement if the drift gillnet fleet has exclusive access to the WRSHA and chooses not to fish there because of greater harvest opportunities in the Nushagak District. Any changes to the management of the two gear groups will affect overall allocation. Little or no effort in the WRSHA during drift gillnet openings would likely result in a decrease in both king and sockeye salmon harvest in the WRSHA.

BACKGROUND: The WRSHA was originally established to allow concurrent openings for both gear types without additional allocation considerations. In 2004, the management plan was revised to prohibit WRSHA openings when the regular commercial fishing district was open. Following the record sockeye salmon run in 2006, which saw over 4 million fish escape into the Wood River, the plan was revised again in 2009 to allow concurrent openings if escapement past the Wood River tower exceeded 1.1 million fish and was projected to surpass 1.4 million. Additionally, the commercial salmon fishery in the WRSHA may be opened only during closures of the subsistence salmon fisheries within the Wood River Special Harvest Area.

In 2012, the board amended the WRSHA plan again to require separate openings for each gear type, following the model used in the Naknek River Special Harvest Area (NRSHA). Current regulations state that any fish harvested in the WRSHA, when opened to target surplus escapement, must be counted toward the regular Nushagak District allocation. In general, when the WRSHA is opened to harvest sockeye salmon surplus to escapement needs, it is usually opened to the set gillnet fleet. This is because the set gillnet fleet is usually behind in harvest percentage relative to the allocation goal. Since the set gillnet fleet is provided the most opportunity, they typically harvest the most fish in the WRSHA (Table 58-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. Opening the WRSHA is an option that has been used in the past to harvest surplus Wood River sockeye salmon while reducing harvest pressure on salmon stocks returning to the Nushagak River. King salmon, some of which are likely of Nushagak River origin, are harvested in WRSHA. Reducing the frequency of WRSHA openings would likely conserve a small number of Nushagak River king salmon. This proposal may reduce the department's ability to manage for the Wood River sockeye salmon escapement goal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 60 – 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Tom Rollman, Levi Rollman, Rick Wysocki, and Bert Luckhurst.

WHAT WOULD THE PROPOSAL DO? Increase the allowed length of set gillnets in the WRSWA from 25 fathoms to 37.5 fathoms.

WHAT ARE THE CURRENT REGULATIONS? When the WRSWA is open to set gillnet gear, a set gillnet may not exceed 25 fathoms in length, and when open to the drift gillnet gear group, the legal gear limit is 75 fathoms.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would increase commercial set gillnet salmon harvest in WRSWA. Some king salmon of unknown origin are harvested in the WRSWA, and some of those fish may be from the Nushagak River (Table 58-1). Increasing gear length may result in additional king salmon harvest by the set gillnet gear group.

BACKGROUND: The WRSWA was originally established to allow concurrent openings for both gear types without additional allocation considerations. In 2004, the management plan was revised to prohibit WRSWA openings when the regular commercial fishing district was open. Following the record sockeye salmon run in 2006, which saw over 4 million fish escape into the Wood River, the plan was revised again in 2009 to allow concurrent openings if escapement past the Wood River tower exceeded 1.1 million fish and was projected to surpass 1.4 million. Additionally, the commercial salmon fishery in the WRSWA may be opened only during closures of the subsistence salmon fisheries within the WRSWA.

In 2010, the first year under the new regulation, drift gillnet harvest and effort exceeded that of the set gillnet fleet (Table 58-1); however, since then—except in 2020, when only the drift gillnet fleet had access—the set gillnet fleet has generally been dominant in both effort and harvest (Table 58-1). In 2012, the board amended the WRSWA plan again to require separate openings for each gear type, following the model used in the Naknek River Special Harvest Area (NRSWA). Current regulations state that any fish harvested in the WRSWA, when opened to target surplus escapement, must be counted toward the regular Nushagak District allocation.

When shifting from concurrent to separate gear-type openings, the primary focus was on the allocation issues this raised. However, the specific gear regulations for set gillnets were not addressed at that time. The original 25-fathom length restriction for set gillnets was likely related to space limitations associated with concurrent gear openings. With the move to single-gear openings, the set gillnet length regulations in the WRSWA could be adjusted to align with those in the NRSWA.

DEPARTMENT COMMENTS: The department is **OPPOSED** to increasing the amount of gear used in WRSWA. Opening the WRSWA is an option that has been used in the past to harvest surplus Wood River sockeye salmon while reducing harvest pressure on salmon stocks returning to the Nushagak River. King salmon, some of which are likely of Nushagak River origin, are harvested in WRSWA. Increasing the amount of gear used by set gillnet permit holders in WRSWA may increase harvest of Nushagak River king salmon. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal may result in an additional direct cost for a private person to participate in this fishery if they choose to take advantage of the new gear length regulation. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 56 – 5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: John O’Connor.

WHAT WOULD THE PROPOSAL DO? Remove the sunset date of May 31, 2026 (5 AAC 06.331(v)) and keep the GPS-defined line (5 AAC 06.331(n)) in regulation.

WHAT ARE THE CURRENT REGULATIONS? In the Nushagak District, a commercial set gillnet operation or any gear associated with a set gillnet operation may not operate seaward of the defined offshore locations, based on a GPS line, from Clark’s Point dock to Etolin Point (Figure 56-1). This regulation was adopted at the 2022 board meeting and has a sunset date of May 31, 2026.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The defined GPS lines described in (5 AAC 06.331) would remain in regulation and no longer be subject to a sunset date (Figure 56-1). Management and enforcement would be consistent and more straightforward if this GPS boundary line remained in regulation.

BACKGROUND: Over time, increased coastal erosion in this area has altered the beach and tide lines used to measure distance from shore. Before GPS-defined boundaries were introduced, the 500-foot offshore limit was measured from either the mean high tide line or the minus three-foot low tide line—whichever was closer to the high tide mark.

Due to these shifting shorelines, estimating the high tide line has become increasingly difficult. This has created uncertainty for commercial fishermen, especially in areas where set gillnet anchors have traditionally been used. In some locations, it is now unclear whether these sites remain legal for fishing, raising concerns about the validity of long-established fishing practices.

To address this, local fishermen surveyed and mapped a GPS line that generally reflects the historical offshore limit for set gillnets. This line was approved on a trial basis during the 2022 board meeting.

DEPARTMENT COMMENTS: The department **SUPPORTS** boundary lines based on GPS coordinates because they are easy to enforce and clear to the public. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

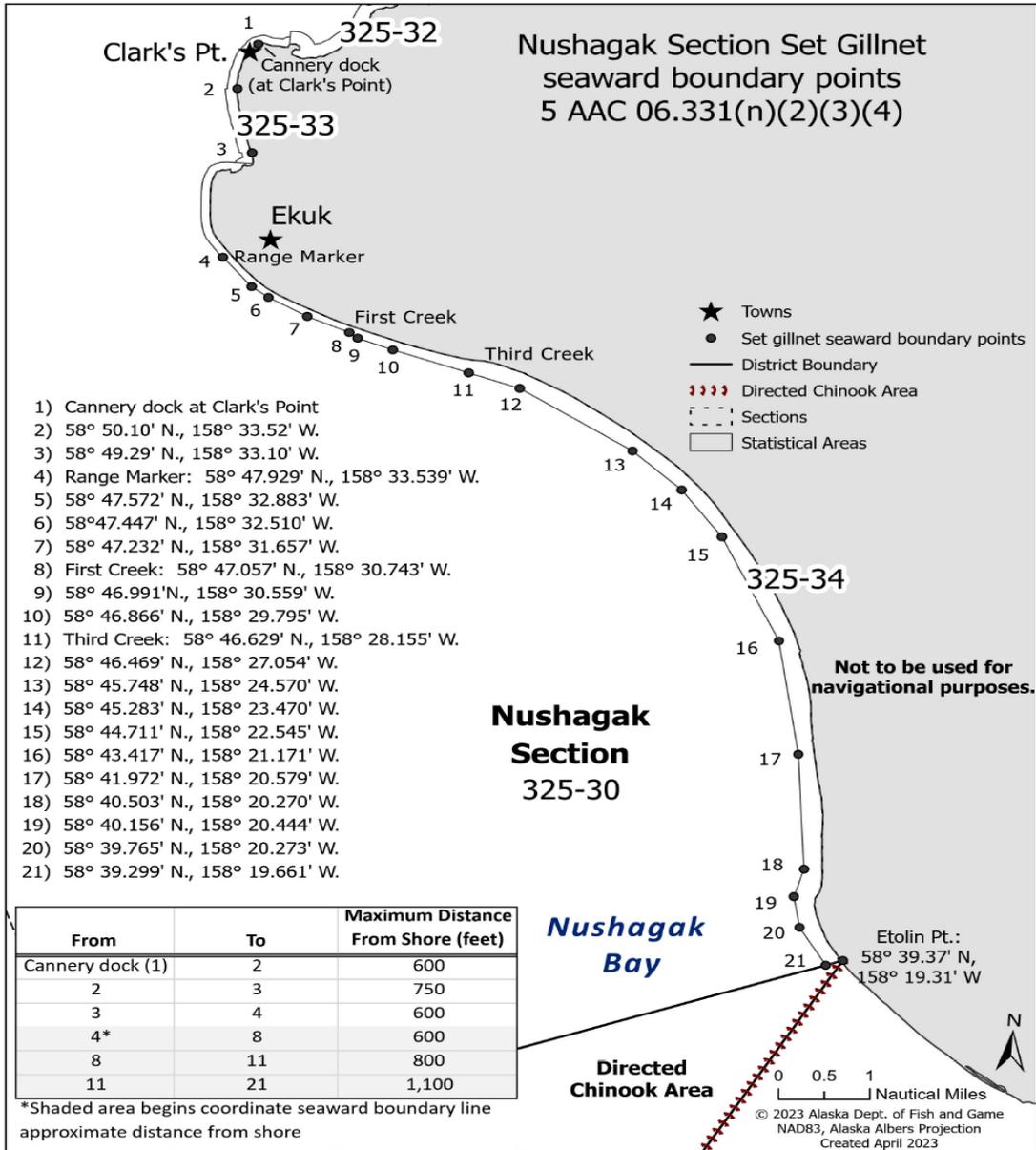


Figure 56-1.—Nushagak Section set gillnet seaward boundary line.

PROPOSAL 57 – 5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: Christine O'Connor, Jamie O'Connor, Sonja Rootvik Ewing, Kevin Ewing, Warren Libby, Avi Friedman, Noris Friedman, Celia Friedman, Jeff Rasco, Haley Rasco, Michelle Atkiq Snyder, Logan Ball, Travis Ball, Terri Stone, Dave Reynolds, Dayle Ferry, Grayson Sanborn, Margot Stroop, Julia Harding King, Cameron Libby, Grayson Libby, Benjamin Ahrens, Bryon Wilson, Dennis Ball, Trace Oxentenko-Ball, Lauri Libby Rootvik, Sean O'Connor.

WHAT WOULD THE PROPOSAL DO? Prohibit operation of drift gillnet gear inside the line established in (5 AAC 06.331 (n)), (Figure 56-1).

WHAT ARE THE CURRENT REGULATIONS? Drift vessels are allowed to fish in all open waters of the Nushagak District, provided they maintain the legal distance from set gillnet gear (commercial or subsistence).

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The line created at the 2022 board meeting would become an inshore boundary line for drift gillnet operations (Figure 56-1). This would reduce the amount of area available to the drift gillnet fleet, may reduce drift gillnet fishery harvest, may increase set gillnet harvest, and reduce gear conflicts. It is not possible to determine how this would impact king salmon harvest.

BACKGROUND: During the 2022 board meeting, an offshore line was proposed and adopted as the new boundary for set gillnets. There is no specific boundary for drift gillnets except for the regulations in (5 AAC 06.335) that defines minimum distance between units of gear. At Ekuk Beach, in particular, this regulation allows for close interaction between set and drift gillnets because there is no minimum distance between gear if set gillnets are at the full legal distance from shore. This has led to frequent conflicts between the two gear groups. Typically, conflicts involve drift gillnets entangling set gillnet buoys and lights, resulting in damage to set gillnet gear. At Ekuk Beach, this is problematic, where fishermen need to set running lines at negative tides, and those running lines are attached to offshore anchors. Most, if not all, the operations at Ekuk Beach operate their nets from shore and do not use skiffs to pick fish. If a running line is broken or damaged, the fisherman might not be able to replace the line for a week or more, depending on the tide cycle.

Historically, drift gillnet vessels have struggled to fish in this area while maintaining the prescribed 300 feet from the side of a set gillnet. The growing prevalence of drift gillnet vessels powered by jet drives has increased the ability of drift gillnet vessels to fish in shallow nearshore areas, previously only utilized by set gillnet operations.

DEPARTMENT COMMENTS: The department **SUPPORTS** regulations that decrease conflicts between user groups and promote an orderly fishery. The department is **NEUTRAL** on the allocative aspect of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 54 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan.

PROPOSED BY: Alaska Department of Fish and Game.

WHAT WOULD THE PROPOSAL DO? Repeal the *Nushagak River Coho Salmon Management Plan*.

WHAT ARE THE CURRENT REGULATIONS? The *Nushagak River Coho Salmon Management Plan* provides guidelines to manage subsistence, sport, and commercial fisheries to meet a coho salmon inriver run goal and SEG in the Nushagak River.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would eliminate the allocative aspects of the *Nushagak River Coho Salmon Management Plan*, including the inriver run goal. The department would manage coho salmon fisheries based on harvest and effort data. This would not result in a change to the way Nushagak River coho salmon have been managed for the past 6 years, when no coho salmon escapement data was collected in the Nushagak River.

BACKGROUND: In 2025, the department eliminated the Nushagak River coho salmon SEG because the department does not have a coho salmon escapement assessment program and does not expect to have one in the future. Without an assessment program, there is no method to determine if the inriver goal of 70,000–130,000 fish and a SEG of 60,000–20,000 fish are being met. These unassessed management objectives are the foundation of the management plan, without which the plan cannot be implemented. Since 2003, escapement has only been assessed 6 times (Table 54-1). Additionally, there has been little market interest in coho salmon, and the stock has minimal commercial exploitation. The average harvest in the commercial fishery has dropped from an average of 65,000 fish to an average of approximately 13,000 fish during the last 3 years; the last significant harvest was in 2020 (Table 54-1). The subsistence and sport fishery harvests have remained consistent over that same time frame (Table 54-1).

Coho salmon harvest (subsistence, commercial, and sport) typically begins to exceed sockeye salmon harvest in late July (Figure 54-1). In recent years, as sockeye harvest declines, processor interest has also decreased, largely because the reduced fishing effort no longer supports large-scale processing operations. Despite this, smaller, local processors continue to operate, and late-season fishery management is focused on accommodating these smaller-scale efforts through monitoring of harvest and effort. By mid-August, average participation from 2003 to 2025 drops to about 10 commercial permits, and by the end of the season, fewer than 5 permits remain active (Figure 54-1). Due to the long-standing lack of escapement data, the department has managed and will continue to manage the commercial coho fishery based on harvest and effort. This represents a standard department approach used to manage lightly exploited stocks without an assessment program.

DEPARTMENT COMMENTS: The department submitted and **SUPPORTS** this proposal. No future assessment is expected to inform stock assessment or escapement goal analysis. The department considers the Nushagak District coho salmon fishery to be sustainable and has no biological concerns, and will respond to conservation concerns, if they arise, through the use of emergency orders. To meet the board’s statutory responsibility under the subsistence law, it should

consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 54-1.–Nushagak District coho salmon harvest and escapement estimates, 2003–2025.

	Harvest			Escapement ^b
	Commercial	Sport ^a	Subsistence	
2003	583	5,033	5,432	ND
2004	47,706	6,800	4,240	152,613
2005	42,456	5,028	5,596	ND
2006	44,385	5,819	3,590	ND
2007	29,578	6,121	3,050	ND
2008	76,932	10,495	5,133	ND
2009	35,171	6,070	6,777	ND
2010	72,909	4,321	2,983	ND
2011	4,712	6,086	5,746	ND
2012	97,382	8,332	2,642	329,946
2013	124,182	6,685	7,717	207,222
2014	242,604	9,542	7,463	483,219
2015	6,614	10,384	5,644	ND
2016	79,538	6,538	4,766	ND
2017	167,347	7,032	5,720	ND
2018	84,320	10,402	4,735	111,455
2019	33,018	5,356	5,229	51,852
2020	76,133	3,418	4,320	ND
2021	27,467	5,691	3,184	ND
2022	5,155	9,063	1,558	ND
2023	7,872	6,737	4,547	ND
2024	22,078	ND	2,577	ND
2025	10,102	ND	ND	ND
2003–2022 Avg.	64,910	6,911	4,776	222,718
2023–2025 Avg.	13,351	6,737	3,562	–

Note: ND = no data

^a Data from the statewide harvest survey. Included harvest from Wood and Togiak Rivers.

^b Escapement goal 70,000 to 130,000. Sonar counts ended on August 16 or 17, prior to the end of the coho salmon run.

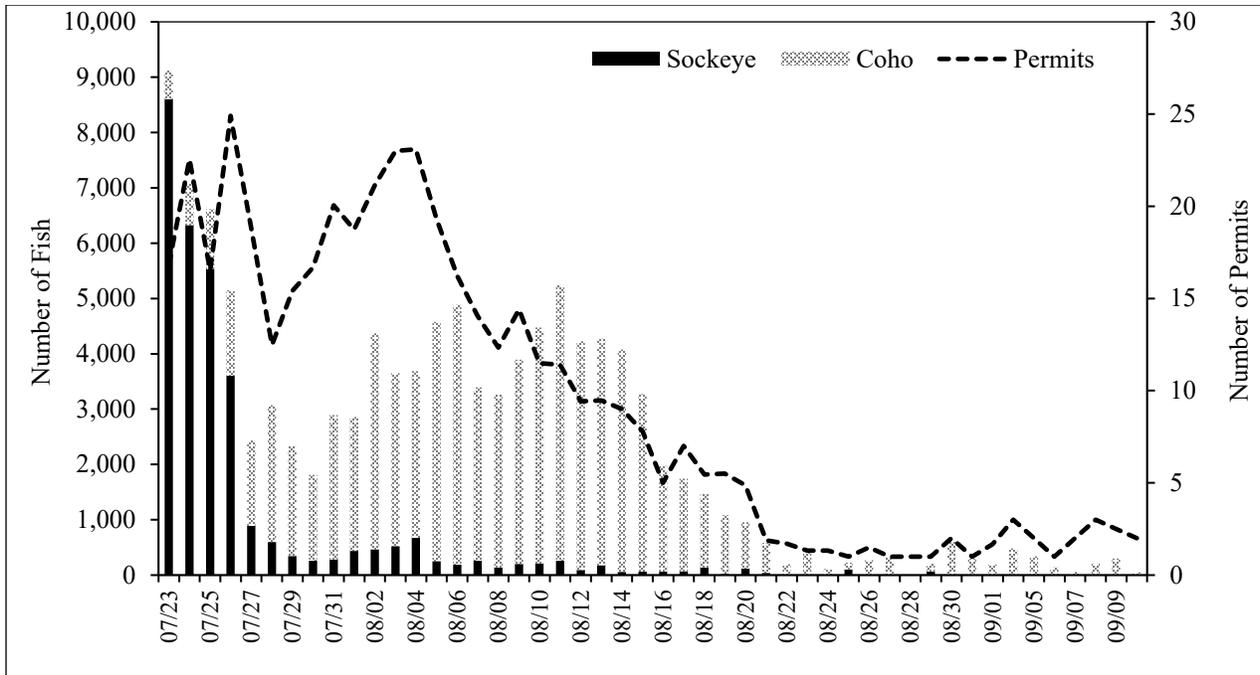


Figure 54-1.—Average daily commercial harvest of sockeye and coho salmon and corresponding number of average active commercial permits in the Nushagak District (2003–2025).

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

PROPOSAL 55 – 5 AAC 06.368. Nushagak River Coho Salmon Management Plan, and 5 AAC 06.358. Wood River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Robert Heyano.

WHAT WOULD THE PROPOSAL DO? Repeal the *Nushagak River Coho Salmon Management Plan* and remove mention of that plan from the *Wood River Special Harvest Area management (WRSHA) Plan*.

WHAT ARE THE CURRENT REGULATIONS? The *Nushagak River Coho Salmon Management Plan* provides guidelines to manage subsistence, sport, and commercial fisheries to meet a coho salmon inriver run goal and SEG in the Nushagak River.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would eliminate the allocative aspects of the *Nushagak River Coho Salmon Management Plan*, including the inriver run goal. The department will manage commercial coho salmon fisheries based on harvest and effort. This would not result in a change to the way Nushagak River coho salmon has been managed for the past 6 years, when no coho salmon escapement data was collected in the Nushagak River.

Nushagak River coho salmon escapement will no longer be tied to commercial fishing opportunities in the WRSOA Plan (5 AAC 06.358).

BACKGROUND: See Proposal 54 background.

The WRSOA was created to allow commercial harvest of Wood River sockeye salmon while protecting returning Nushagak River coho salmon. Although that was the intent, the area was never opened for this purpose. Soon after its establishment, Nushagak River sockeye salmon began to perform poorly, and the WRSOA was repurposed to protect Nushagak sockeye salmon while providing harvest opportunity on Wood River sockeye salmon. This is how it was used throughout the late 1990s and early 2000s.

Now that Nushagak sockeye salmon are no longer a concern, the WRSOA is used primarily to harvest surplus Wood River sockeye salmon. Because Nushagak River coho salmon escapement data are not available, the area is no longer managed with coho salmon protection in mind. By the time coho salmon become the dominant species in the fishery, there are usually too few sockeye salmon—and too few active commercial permit holders—remaining for a WRSOA-only restriction to be practical or effective.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal. No future assessment is expected to inform stock assessment or escapement goal analysis. The department considers the Nushagak District coho salmon fishery to be sustainable and has no biological concerns and will respond to conservation concerns, if they arise, through the use of emergency order. To meet the board’s statutory responsibility under the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

COMMITTEE OF THE WHOLE—GROUP 2: EASTSIDE MANAGEMENT, FISHING DISTRICTS, AND FISHING SEASONS, PERIODS AND REPORTING (18 PROPOSALS)

EASTSIDE MANAGEMENT (9 PROPOSALS)

PROPOSAL 45 – 5 AAC 06.370. Registration and reregistration.

PROPOSED BY: Richard J. Wilson.

WHAT WOULD THE PROPOSAL DO? Extend the district registration period in the Naknek-Kvichak District to 9:00 a.m. July 22.

WHAT ARE THE CURRENT REGULATIONS? Commercial drift gillnet operations are required to register or reregister in the Naknek-Kvichak District from June 1 to 9:00 a.m. July 17. After 9:00 a.m. July 17 drift gillnet operations can move freely between all districts except Togiak, unless fishing is open in the Naknek River Special Harvest Area (NRSHA) or the Kvichak River Special Harvest Area (KRSHA) after 9:00 a.m. July 17, then the registration and reregistration requirements as specified in (5 AAC 06.370) still apply. Set gillnets are not required to register in the Naknek-Kvichak District.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would likely reduce late season commercial fishing effort in the Naknek-Kvichak District. In years with late sockeye salmon run timing, this would increase the department’s ability to manage sockeye salmon escapements within the escapement goal ranges, proportional to run size, and reduce late-season harvest of king salmon.

BACKGROUND: The Naknek-Kvichak District has later sockeye salmon run timing than Egegik and Nushagak districts. As abundance in those districts decreases, drift gillnet vessels transfer to the Naknek-Kvichak District. Vessels that transfer prior to July 17 must serve a 48-hour transfer wait period. Many vessels choose to wait until 9:00 a.m. July 17 to fish in the Naknek-Kvichak District to avoid losing fishing time, so the vessel count in the district increases on that date. At the same time, the fall fishing schedule of 9:00 a.m. Monday to 9:00 a.m. Sunday begins. When this happens, daily escapement and set gillnet harvests decrease. When sockeye salmon escapements are below the escapement goals after July 17, the fishery is managed under the NRSHA management plan or the KRSHA management plan, and registration and reregistration are still required.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 46 and 47 – 5 AAC 06.364. Naknek-Kvichak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan, and 5 AAC 06.320. Fishing periods.

PROPOSED BY: Richard J. Wilson.

WHAT WOULD THE PROPOSAL DO? Change the end date used to calculate allocation from July 17 to July 22 and extend the emergency order period from July 17 to July 22 in the Naknek-Kvichak District.

WHAT ARE THE CURRENT REGULATIONS? In the Naknek-Kvichak District from June 1 through 9:00 a.m. July 17 salmon may only be taken during fishing periods established by emergency order. After 9:00 a.m. July 17, salmon may only be taken from 9:00 a.m. Monday to 9:00 a.m. Sunday or during periods established by emergency order.

The allocation of sockeye salmon is 84% drift gillnet, 8% Kvichak Section set gillnet, and 8% Naknek Section set gillnet. The accounting period is from June 1 through 9:00 a.m. July 17.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? In years with late sockeye salmon run timing, this would increase the department's ability to manage sockeye salmon escapements within the escapement goal ranges proportional to run size. This would increase the department's ability to manage for the allocation percentages specified in the allocation plan. Extending emergency order tide-by-tide management would reduce harvest of king salmon.

BACKGROUND: The Naknek-Kvichak District has later sockeye salmon run timing than the Egegik and Nushagak districts. As abundance in those districts decreases, drift gillnet vessels transfer to the Naknek-Kvichak District. Vessels that transfer prior to July 17 must serve a 48-hour transfer wait period. Many vessels choose to wait until 9:00 a.m. July 17 to fish in the Naknek-Kvichak District to avoid losing fishing time, so the vessel count in the district increases on that date. At the same time, the fall fishing schedule of 9:00 a.m. Monday to 9:00 a.m. Sunday begins. When this happens, daily escapement and set gillnet harvest decrease.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 48 – 5 AAC 06.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Reid Ten Kley.

WHAT WOULD THE PROPOSAL DO? Change the seasonal ratio of commercial fishing periods in the Kvichak River Sockeye Salmon Special Harvest (KRSHA) Area to 2 drift gillnet fishing periods to 1 set gillnet fishing period, and require all set gillnet gear beyond 30 feet from shore to be removed when not fishing.

WHAT ARE THE CURRENT REGULATIONS? The current fishing period ratio is three drift gillnet fishing periods to one set gillnet fishing period, with set gillnet fishing being the first period. Beyond 500 feet from shore, all set gillnet gear must be removed when not fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce the number of drift gillnet fishing periods and increase the number of set gillnet fishing periods when fishing is restricted to the KRSHA. Reducing the drift gillnet to set gillnet ratio would likely increase escapements in the Kvichak and Alagnak Rivers; however, exceeding escapement goals is unlikely because the Kvichak River has a large escapement goal range (2 million to 10 million), and the Alagnak River has a lower bound SEG.

BACKGROUND: The *Kvichak River Sockeye Salmon Special Harvest Area Management Plan* was adopted at the 2025 Statewide Finfish Meeting. The intent at the time was to have this management plan mirror the Naknek River Sockeye Salmon Special Harvest Area Management Plan. The KRSHA did not open during the 2025 season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 49 – 5 AAC 06.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Aaron Schrier.

WHAT WOULD THE PROPOSAL DO? Change the ratio of commercial fishing periods in the Kvichak River Sockeye Salmon Special Harvest Area (KRSHA) depending on drift gillnet participation.

WHAT ARE THE CURRENT REGULATIONS? The current fishing period ratio is three drift gillnet fishing periods to one set gillnet fishing period, with set gillnets fishing the first period.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce the number of drift gillnet fishing periods and increase the number of set gillnet fishing periods when fishing is restricted to the KRSHA if drift gillnet participation is less than 500 vessels. Reducing the drift gillnet to set gillnet ratio would likely increase escapements in the Kvichak and Alagnak Rivers; however, exceeding escapement goals is unlikely because the Kvichak River has a large escapement goal range (2 million to 10 million), and the Alagnak River has a lower bound SEG.

BACKGROUND: The *Kvichak River Sockeye Salmon Special Harvest Area Management Plan* was adopted at the 2025 Statewide Finfish Meeting. The intent at the time was to have this management plan mirror the Naknek River Sockeye Salmon Special Harvest Area Management Plan. The KRSHA did not open during the 2025 season.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 50 – 5 AAC 06.355. Bristol Bay Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan.

PROPOSED BY: Reid Ten Kley.

WHAT WOULD THE PROPOSAL DO? Add a new section to (5 AAC 06.335) that would direct the department to manage the Bristol Bay commercial salmon fishery for the highest level of product value with minimum waste.

WHAT ARE THE CURRENT REGULATIONS? This plan directs the department to manage for adequate escapement and to distribute the harvestable surplus to set and drift gillnet fisheries as specified by each district-specific allocation plan.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The effect is unknown because the proposal does not specify how the department would manage to achieve the highest level of product value with minimum waste.

BACKGROUND: The department's primary objective in managing the Bristol Bay salmon fishery is to achieve established escapement goals, to the extent practicable, the department works with harvesters and processors to maximize the value of landed catch.

DEPARTMENT COMMENTS: The department **OPPOSES** adopting additional management metrics that would hinder the department from managing fisheries to achieve established escapement goals, our primary management objective. The department is **NEUTRAL** on the allocative aspect of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal may result in additional cost to the department to evaluate fish quality/product value metrics into management.

PROPOSAL 51 – 5 AAC 03.374. Kvichak River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Reid Ten Kley.

WHAT WOULD THE PROPOSAL DO? Allow drift gillnet vessels to carry additional gear while fishing in the Kvichak River Sockeye Salmon Special Harvest Area (KRSHA) if the gear is stored in a net bag or brailer bag.

WHAT ARE THE CURRENT REGULATIONS? Drift gillnet vessels fishing in the KRSHA may not use more than 75 fathoms of drift gillnet to take salmon, may not use more than one gillnet to take salmon at any time, and may not have more than 150 fathoms onboard the vessel.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce drift gillnet harvest and increase escapement by the same amount because fishing periods are dependent on the ratio set in the management plan.

BACKGROUND: In the KRSHA and the Naknek River Sockeye Salmon Special Harvest Area, it is common practice for commercial drift gillnet vessels to round haul and pick one 75-fathom gillnet while fishing with another 75-fathom gillnet. Dual permit vessels must remove 50 fathoms of gillnet before fishing in these special harvest areas. In the Wood River Sockeye Salmon Special Harvest Area drift gillnet vessels can fish with 75-fathom nets, and they may have up to 200 fathoms onboard if the additional gear is tied up in a net bag or brailer bag.

DEPARTMENT COMMENTS: The department **SUPPORTS** requiring more than 75 fathoms of gear to be tied up in a net bag or brailer bag for enforcement purposes. The department is **NEUTRAL** on the allocative aspect of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 52 – Create an Upper Egegik River Sockeye Salmon Special Harvest Area Management Plan, and 5 AAC XX.XXX. New Section.

PROPOSED BY: Luke Gardener.

WHAT WOULD THE PROPOSAL DO? Create an Upper Egegik River Sockeye Salmon Special Harvest Area (UERSHA) that would add about 4 miles of fishing area to the upriver portion of the district where the river narrows (Figure 52-1). It may be opened when sockeye salmon escapement is projected to meet the minimum escapement goal range of 800,000 fish, and it would be required to open once the department is projecting escapement above the midpoint of the escapement goal range (1.4 million fish). Commercial drift, set, or both gear types may fish the area when in use, and openers in the UERSHA would be of equal or greater length than in the full district.

WHAT ARE THE CURRENT REGULATIONS? The upper boundary of the Egegik District is currently a line between 58 12.80’N, 157 17.04’W and 58 12.28’N, 157 18.53’W. The *Egegik District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management Plan* (5 AAC 06.365) establishes an allocation of 86% drift gillnet and 14% set gillnet. The *Egegik River Sockeye Salmon Special Harvest Area Management Plan* (5 AAC 06.359) is in place to minimize interception of sockeye salmon bound for other systems, while providing opportunity to harvest Egegik River sockeye salmon in excess of the escapement goal.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It would require the department to open additional area to commercial fishing if escapement is projected to exceed the midpoint of the escapement goal range and reduce the department’s ability to manage for escapements proportional to run size. Commercial gear conflicts could be common in this relatively small area, and expanding the size of the district could complicate enforcement. Harvest of salmon species other than sockeye salmon may increase.

BACKGROUND: The upper end of the Egegik River escapement goal (2 million sockeye salmon) has been exceeded in 4 years since the upper bound was raised in 2015. This period has coincided with larger runs to Bristol Bay as a whole. Before this period, escapement in the Egegik River only exceeded the upper end of the escapement goal 3 times, back to the early 1990s. Escapements have been kept within the escapement goal range in years with even larger runs under the current management plan.

Allocation between set and drift gillnet gear types has been challenging to balance in recent years. The allocation plan was put in place when more drift gillnet vessels were regularly fishing in the Egegik District. Since then, large runs to other systems, specifically the Nushagak, have pulled boats away from Egegik, making drift allocation difficult to achieve with any precision.

The department manages each river system for an escapement level dependent on run size. This requires tide-by-tide management flexibility. When necessary, fishing 2 tides per day with both gear groups can be effective for controlling escapement. There is no conservation concern with the current management plan and how it has been implemented. Recent large returns to the Egegik system in 2022 and 2023 where 18.2 and 14.8 million sockeye salmon returned to the district and

yielded exploitation rates of 89 and 90%, respectively. Escapement remained within the SEG range in both years.

DEPARTMENT COMMENTS: The Department **OPPOSES** aspects of this proposal that limit time and area management flexibility to respond to inseason salmon abundance. It is unclear whether this area would be used only during the June 1–July 17 allocation period and whether it could be closed once it is opened. Additionally, there is limited space in this area, increasing the likelihood of gear conflicts that could be difficult to enforce given the distance between the area and district. The department is **NEUTRAL** on the allocative aspects of this proposal. To meet the board’s statutory responsibility under the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

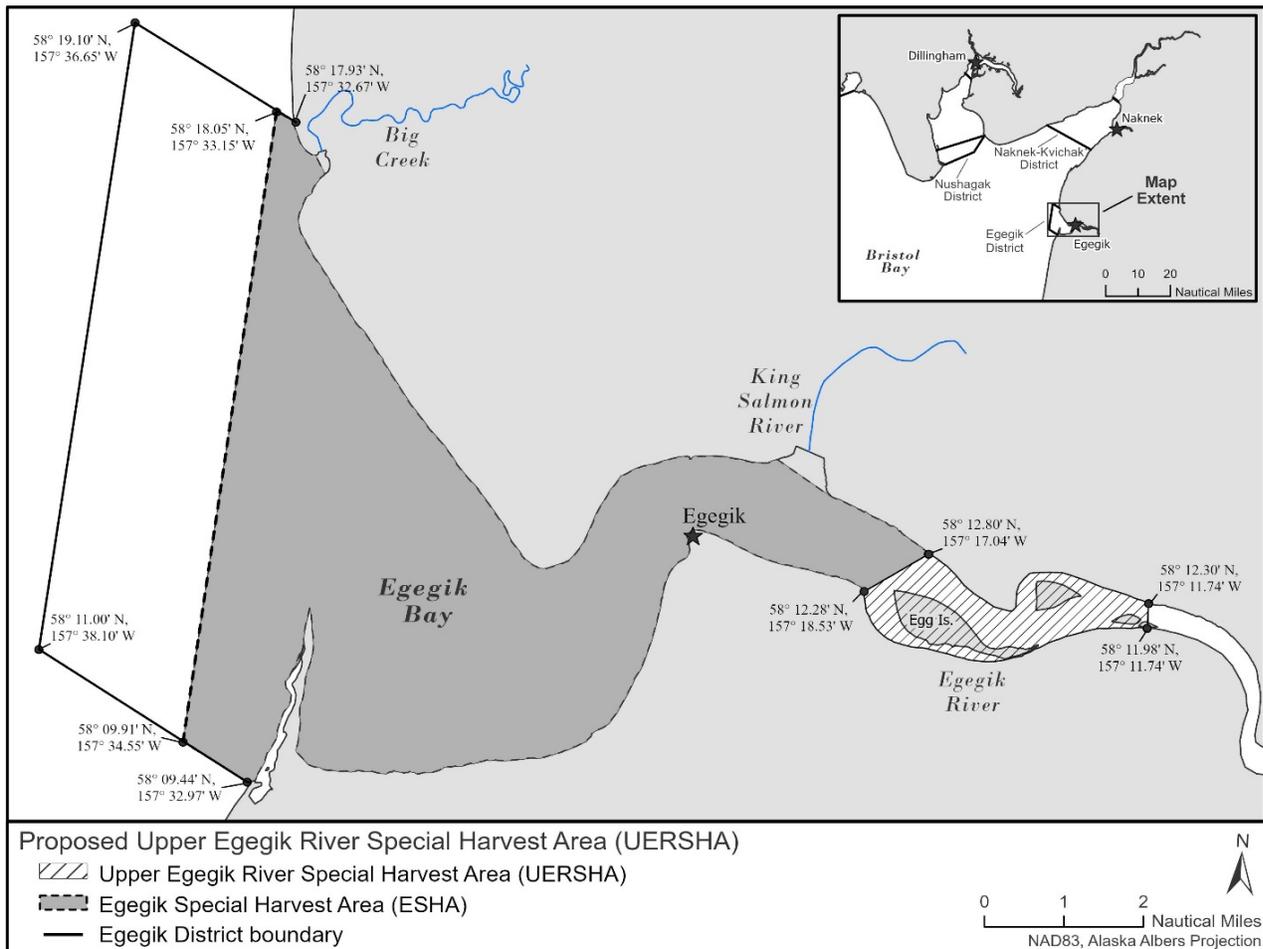


Figure 52-1.—Proposed Upper Egegik River Special Harvest Area (UERSHA)

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

PROPOSAL 53 – 5 AAC 06.359. Egegik River Sockeye Salmon Special Harvest Area Management Plan.

PROPOSED BY: Matt Marinkovich.

WHAT WOULD THE PROPOSAL DO? Allow managers to close a portion of the Egegik District when illegal fishing occurs. The western boundary line of the Egegik District would be moved into the Egegik Special Harvest Area (ESHA) line, effectively taking away much of the north line of the district, where most illegal fishing in closed waters occurs. This could occur at any point in the season.

WHAT ARE THE CURRENT REGULATIONS? The *Egegik River Sockeye Salmon Special Harvest Area Management Plan* (5 AAC 06.359) is in place to minimize interception of sockeye salmon bound for other systems, while providing opportunity to harvest Egegik River sockeye salmon in excess of the escapement goal. The department has the authority to restrict time and area for the protection of fish stocks.

The *Policy on closures due to illegal fishing* (5 AAC 39.185) allows the commissioner to close a fishery by emergency order for a period of up to one week; continued violations may result in additional closures if deemed necessary.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This may close a large area of the Egegik District where most of the commercial drift gillnet fleet fish (Figure 53-1). This would reduce the fleet's efficiency and could impact the department's ability to control escapement in years with large sockeye salmon runs.

BACKGROUND: An intensive district boundary line fishery regularly develops on the north line of the Egegik District. When the district is on the fall schedule and enforcement resources have left Bristol Bay, there are often reports of illegal fishing along this boundary line. In 2024, the entire Egegik District was closed to drift gillnet fishing for 4 days beginning on July 25 in response to reports of illegal fishing activity at the north line late season.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. The department already has the authority to close fisheries due to illegal fishing.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

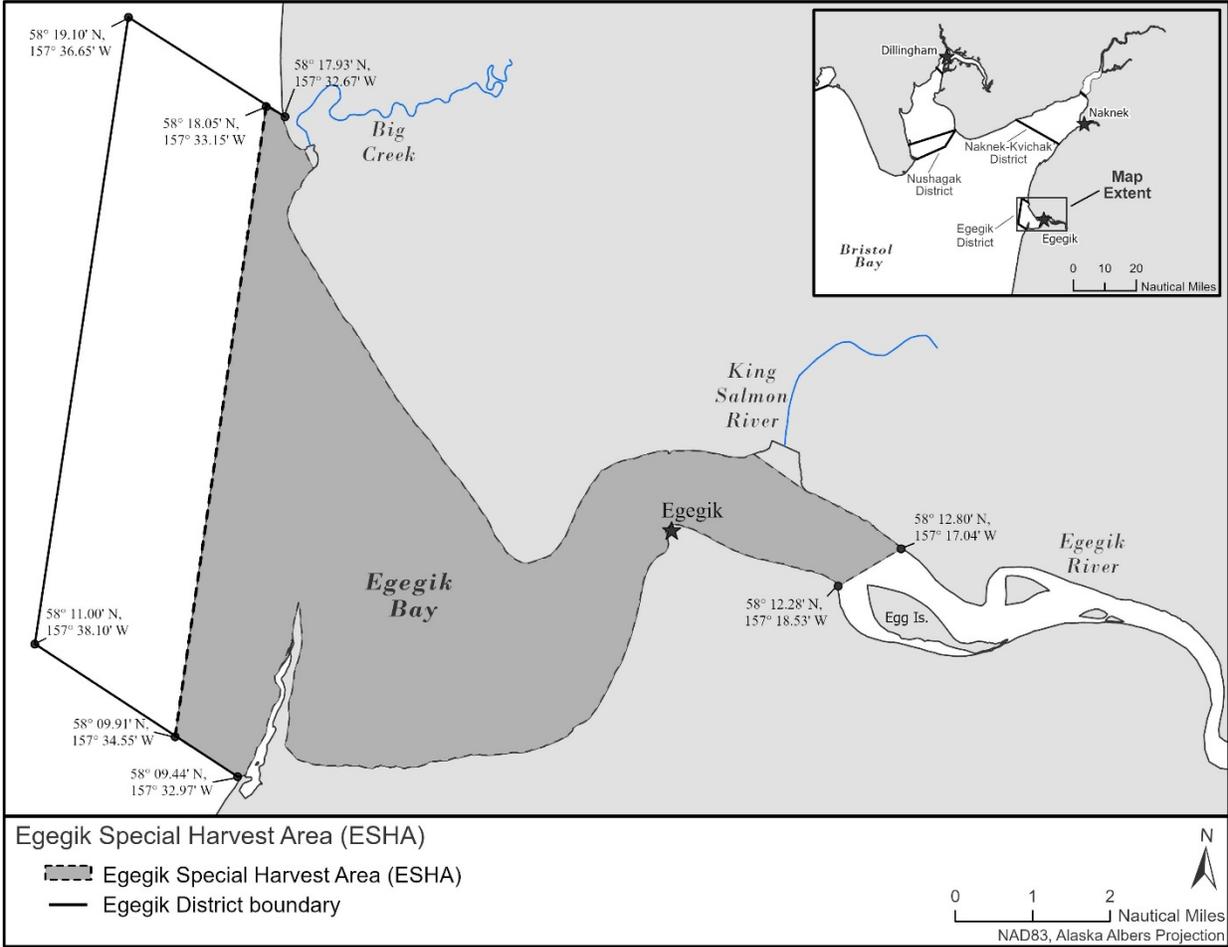


Figure 53-1.—Egegik Special Harvest Area (ESHA).

FISHING DISTRICTS (5 PROPOSALS)

PROPOSAL 70 – Extend the northern boundary in the Ugashik District, and 5 AAC 06.200. Fishing districts and sections.

PROPOSED BY: Bristol Bay Reserve Association.

WHAT WOULD THE PROPOSAL DO? Extend the north line of the Ugashik District to the 3-mile state water boundary (Figure 70-1).

WHAT ARE THE CURRENT REGULATIONS? Currently, the district's north line extends approximately 1 mile offshore to 57° 43.54'N, 157° 43.80'W. The goal of the *Ugashik District Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan* is to achieve an allocation of 90% drift gillnet and 10% set gillnet, while providing opportunity to harvest Ugashik River sockeye salmon in excess of the escapement goal. The plan has provisions to minimize interception of Kvichak River fish (5AAC 06.366(f)) if the Kvichak River forecast will not allow for an exploitation rate of greater than 40%.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This may increase harvest in the Ugashik District by an unknown amount, and include intercepted fish from other districts and areas (Table 70-1). Allocation in the district would likely further favor the drift fleet with the expanded drift fishing area.

BACKGROUND: The Ugashik District western boundary line was moved from a point on land near Smokey Point, north to Cape Grieg in 1967. The northern boundary was moved to a point 1 mile offshore in 1980. The current Ugashik District boundary has been in place since 2007, when the north line was adjusted to be perpendicular to shore.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

Table 70-1.–Mean proportions of commercial harvest by stock and total harvest, Ugashik District 2016–2025.

	Kusko.	Togiak	Igushik	Wood	Nush.	Kvichak	Alagnak	Naknek	Egegik	Ugashik	N. Pen.	Total Harvest
2016	0.0	0.2	1.4	0.7	0.6	9.7	2.4	2.1	13.2	68.0	1.8	6,630,231
2017	0.0	0.0	0.1	0.3	0.3	0.4	0.1	0.3	9.4	89.0	0.2	5,705,712
2018	0.0	0.0	0.0	15.2	4.2	0.1	0.0	2.0	2.7	75.7	0.0	2,771,945
2019	0.0	0.0	0.0	0.4	0.1	0.6	0.0	0.1	13.7	83.1	1.9	1,037,030
2020	0.1	0.0	0.0	0.0	0.0	0.5	0.9	0.6	2.6	94.8	0.5	2,598,269
2021	0.1	0.0	0.0	0.1	0.1	0.5	1.1	0.1	9.2	87.5	1.2	5,205,169
2022	0.2	0.2	0.4	0.5	0.6	15.4	3.5	2.3	20.8	56.0	0.2	6,247,386
2023	0.0	0.0	0.0	0.0	0.0	0.6	1.1	2.3	9.3	86.3	0.3	2,282,217
2024	0.1	0.1	0.5	2.7	0.0	1.1	0.0	1.5	4.6	88.0	1.4	4,245,179
2025	0.2	0.2	0.0	0.4	0.3	2.0	1.9	0.7	24.2	70.2	0.1	4,981,397

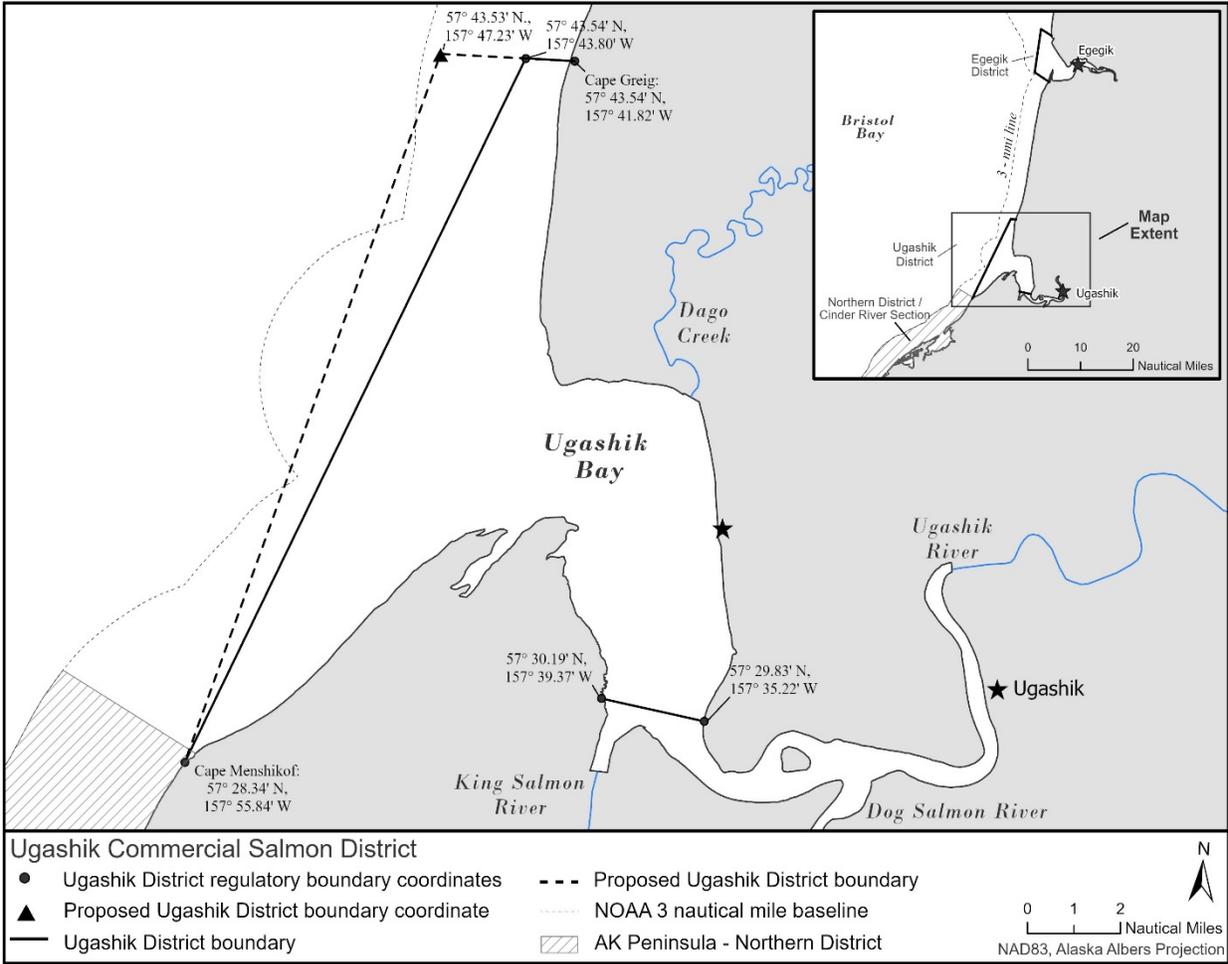


Figure 70-1.—Ugashik District current and proposed boundary lines.

PROPOSALS 71, 72, 73, and 74 – 5 AAC 06.XXX. New Section.

PROPOSED BY: Joel A. Ludwig (Proposal 71), David Vardy (Proposal 72), George Wilson Jr. (Proposal 73), Doug Morgan (Proposal 74).

WHAT WOULD THE PROPOSALS DO? Proposal 71 would allow the department to open the General District (GD) by emergency order (EO) when escapement goals have been met in eastside districts (Naknek–Kvichak, Egegik, and Ugashik). Proposal 73 would enact this GD when the fall fishing schedule is in effect. Proposal 74 would require all Bristol Bay districts to have met their escapement goals before a GD could be opened. Proposal 72 would establish new western boundary lines (4 options for Late Season Harvest Areas) when Nushagak, Naknek-Kvichak, Egegik, and Ugashik districts have met the midpoints of their escapement goals, and the 48-hour transfer period has been waived in those districts.

WHAT ARE THE CURRENT REGULATIONS? Current regulations allow fishing in terminal Bristol Bay districts associated with major river systems according to management plans. Each system is managed to achieve an escapement goal within an established range. In addition, the department attempts to manage harvest by gear group to achieve allocation targets established by the board, which vary by district.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? These proposals would allow commercial fishing on multiple species of salmon from stocks of unknown origin and run strength, including stocks from outside Bristol Bay. All GD harvest would be caught by drift gillnet gear, which could reduce set gillnet gear harvest and make it more challenging to meet the board’s allocation objectives for each district.

BACKGROUND: In 2004, a large preseason run forecast prompted the board to adopt a plan allowing for use of the GD to help provide additional harvest opportunity. Approximately 1.7 million sockeye salmon were caught in the GD, which was open June 7 through June 22. The plan had a sunset date of December 31, 2004. Accordingly, the department submitted an agenda change request for consideration of the sunset clause in 2004 and the board allowed the regulation to sunset. Proposals to incorporate annual use of the GD came before the board in December 2006, 2009, and 2012. In March 2008, a petition to allow fishing in the southern section of the GD was submitted and denied. The GD creates management difficulties when fish caught in the GD need to be allocated to rivers of origin because of the mixed-stock nature of the harvest and delivery patterns of permit holders within the district. Inaccurate allocation of stocks may result in more inaccurate inseason harvest forecasting, estimates of total run, and other metrics.

The *Bristol Bay Commercial Drift and Set Gillnet Sockeye Salmon Management and Allocation Plan* (5 AAC 06.355) instructs the department to manage Bristol Bay sockeye salmon fisheries terminally, using run-strength information developed inseason. The plan directs that these stocks will be managed as they return to districts associated with major river systems under the following priorities: 1) achievement of biological escapement goals, 2) maintenance of genetic diversity, and 3) providing any harvestable surplus of salmon to users. The board expressed its intent that harvest of any surplus continues to take place in traditional areas and allocated between user (gear) groups, while recognizing that interceptions of stocks from adjacent areas will occur. The board further

directed the department to minimize interception, to the extent practicable, without compromising the objectives.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the GD concept because it will increase the intercept of non-local stocks and complicate the department's ability to assign catch to river of origin. The department is **NEUTRAL** on the allocative aspects of these proposals. To meet the board's statutory responsibility to the subsistence law, it should consider whether subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of these proposals is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of these proposals may result in an additional cost to the department. Additional catch sampling would likely be required by extending the season. Additional genetic stock composition estimates would be needed to apportion the GD harvest to stock of origin.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

FISHING PERIODS, SEASONS, AND REPORTING (4 PROPOSALS)

PROPOSAL 92 – 5 AAC 06.310 Fishing seasons.

PROPOSED BY: Graham Morrison and Joey Klutsch.

WHAT WOULD THE PROPOSAL DO? Close the commercial salmon fishing season in the Naknek-Kvichak District on July 25.

WHAT ARE THE CURRENT REGULATIONS? The commercial fishing season is from June 1 to September 30 during open commercial fishing periods. From July 17 to September 30, commercial fishing periods are from 9:00 a.m. Mondays to 9:00 a.m. Sundays.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would have little effect on how the department manages for sockeye salmon escapement goals in most years because, on average, most sockeye salmon have passed through the commercial fishing district by July 25. In addition, active management of the district ends on July 17. This would reduce commercial salmon harvest and increase inriver abundance of salmon species, particularly coho and pink salmon. Subsistence salmon fishing would close in the Naknek-Kvichak District, but would remain open in the Naknek, Kvichak, and Alagnak Rivers where most subsistence fishing occurs.

BACKGROUND: The Naknek-Kvichak District is actively managed for sockeye salmon SEGs from June 1 to July 17. The department does not have escapement assessment projects in the Naknek-Kvichak District for king, chum, pink, or coho salmon. The department uses a fall fishing schedule to provide closed periods for the escapement of these species. In 2018, the board changed the fall schedule from 9:00 a.m. Monday to 9:00 a.m. Friday to the current fall schedule of 9:00 a.m. Monday to 9:00 a.m. Sunday to sustain markets. In most years, the major processors cease buying fish in the last week of July or first week of August, depending on sockeye salmon run abundance and timing.

The abundance of king, chum, pink, and coho salmon has generally been low in the Naknek-Kvichak District. These low abundances are thought to be caused by environmental conditions, and not harvest patterns, because the numbers have been generally low statewide. Harvests of these species in the Naknek-Kvichak District have been below average for the past 3 years, but within the range of harvest observed in the last 20 to 25 years.

From 2023 to 2025, annual average commercial harvest after July 24 was 1% of sockeye salmon (83,458 fish), 2% of king salmon (17 fish), 5% of chum salmon (3,402 fish), 57% of pink salmon (1,416 fish) and 77% of coho salmon (592 fish). The annual average of landings during this time was 3% or 540 deliveries. The latest sockeye salmon run timing on record occurred in 2018. In that season, commercial harvest after July 24 was 8% of sockeye salmon (716,197 fish), 10% of king salmon (241 fish), 35% of chum salmon (107,678 fish), 98% of pink salmon (29,929 fish), and 91% of coho salmon (10,559 fish). There were 2,289 deliveries.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. To meet the board's statutory responsibility to the subsistence law, it should consider whether

subsistence regulations continue to provide a reasonable opportunity for subsistence uses if the proposal is adopted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? No.
2. Is the stock customarily and traditionally taken or used for subsistence? Yes. The board has made a positive customary and traditional use finding for all salmon in the Bristol Bay Area (5 AAC 01.336)
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? The board has determined that 157,000–172,171 salmon are reasonably necessary for subsistence uses, including 55,000–65,000 Kvichak River drainage sockeye salmon; this finding does not include salmon stocks in the Alagnak River.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.
6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

PROPOSAL 93 – 5 AAC 06.320. Fishing periods.

PROPOSED BY: Togiak Fish and Game Advisory Committee.

WHAT WOULD THE PROPOSAL DO? Change the current fishing schedule (9:00 a.m. Monday- 9:00 p.m. Wednesday) in Kulukak Bay to 9:00 a.m. Monday – 9:00 a.m. Friday.

WHAT ARE THE CURRENT REGULATIONS? Salmon may be commercially taken from 9:00 a.m. Monday to 9:00 p.m. Wednesday in the Kulukak Section of the Togiak District.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be more fishing time in Kulukak Section of the Togiak District. This would likely increase harvest of the small run of Kulukuk River sockeye salmon and sockeye salmon bound for the Togiak River as well as king salmon bound for the Kulukuk and Togiak Rivers.

BACKGROUND: Although there are 2 systems in Kulukak Bay that produce sockeye salmon, they are relatively small, and the department does not actively monitor them. Historically, the Kulukak Bay fishery has been considered an intercept fishery for sockeye salmon bound for Togiak Bay. The historical fishing schedule in Kulukak Bay ran from 9:00 a.m. Monday to 9:00 a.m. Thursday. However, the department routinely reduced this schedule by emergency order to 9:00 a.m. Monday through 9:00 a.m. Wednesday. This adjustment was made in response to increasing fishing effort in Kulukak Bay, as fishermen who had historically operated in Togiak Bay shifted into Kulukak Bay to gain earlier access to Togiak-bound sockeye. Following discussions with Togiak-area fishermen and the Togiak Advisory Committee, the department adopted a consistent management approach for Kulukak Bay, setting the fishing schedule from 9:00 a.m. Monday to 9:00 p.m. Wednesday. This schedule is now the standard department practice.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal because it would reduce the department’s ability to manage for the conservation of small, unmonitored sockeye and king salmon stocks.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 94 – 5 AAC 06.369. Togiak District Salmon Management Plan.

PROPOSED BY: Togiak Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Remove the 48-hour maximum extension time for Togiak River Section in regulation.

WHAT ARE THE CURRENT REGULATIONS? When the strength of the sockeye salmon run warrants additional fishing time, the department's Emergency Order (EO) authority is restricted to a maximum of 48 hours each week, in addition to the normal weekly fishing schedule.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The department could extend fishing time more than 48 hours in the Togiak River Section based on sockeye salmon escapement.

BACKGROUND: From July 1 to July 16, the weekly commercial fishing schedule in the Togiak River Section is expanded, and the 48-hour extension allows for continuous fishing. After July 16, and corresponding more with the peak of the run, the department is limited by the 48-hour restriction. This is exacerbated by a 50% decrease in drift gillnet effort since 2019. In 2019, there were 44 drift permits registered to fish in the Togiak District by July 15. In 2025 that number was 23. This decrease in fishing effort makes it difficult to control escapement into the Togiak River. Removing the 48-hour maximum extension rule will allow for the possibility of additional fishing time if needed to control escapement.

DEPARTMENT COMMENTS: The department **SUPPORTS** this proposal because it would allow greater ability to meet the Togiak River sockeye salmon escapement goal. Adoption of this proposal may result in the increased harvest of king or coho salmon, but the run timing of those species has minimal overlap with the sockeye salmon that would be targeted.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 95 – 5 AAC 06.370 Registration and reregistration.

PROPOSED BY: Matt Marinkovich.

WHAT WOULD THE PROPOSAL DO? Allow a drift gillnet permit holder to unregister their permit and vessel prior to 9:00 a.m. June 25. They could not fish for 48 hours while waiting to be unregistered. After the 48-hour waiting period they could register for any district, except Togiak, and begin fishing immediately.

WHAT ARE THE CURRENT REGULATIONS? Prior to fishing, a drift gillnet permit holder must register their permit and vessel to fish in a district. They may fish immediately once the initial registration is completed. If they want to fish in another district, they must transfer the permit and vessel to that district and wait a 48-hour district transfer notification period without fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would likely increase drift gillnet effort in Naknek-Kvichak, Egegik, and Ugashik Districts prior to June 25.

BACKGROUND: There is an early season commercial fishing schedule of 9:00 a.m. Monday to 9:00 a.m. Friday for approximately the first 3 weeks of June because fishing effort and fish abundance is low. After the early season schedule, fishing time on the eastside districts depends on sockeye salmon abundance and is unpredictable. Some permit holders wait until the run develops to choose a district. Registration is a long-standing regulation; however, from 2010 to 2015, registration was not required until June 25 in Naknek-Kvichak, Egegik, and Ugashik districts. This was adopted to increase the early season harvest; however, it increased management uncertainty because effort was unpredictable.

DEPARTMENT COMMENTS: The department **SUPPORTS** requiring early season registration to inform management decisions. The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is expected to result in an additional cost to the department.

COMMITTEE OF THE WHOLE—GROUP 3: GEAR SPECIFICATIONS AND VESSEL SPECIFICATIONS (17 PROPOSALS)

GEAR SPECIFICATIONS (7 PROPOSALS)

PROPOSALS 75, 76 and 78 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Justin Arnold (Proposal 75), Abe Williams (Proposal 76), and Hayden Hinschied (Proposal 78).

WHAT WOULD THE PROPOSALS DO? These would allow the owner of 2 CFEC drift gillnet permits to operate 200 fathoms of drift gillnet gear from a single vessel (permit stacking).

WHAT ARE THE CURRENT REGULATIONS? Current regulations limit the length of a commercial drift gillnet to no more than 150 fathoms per vessel unless 2 CFEC drift gillnet permit holders are on board a vessel at the same time, the vessel and permit holders have registered as a dual operation, and the vessel is marked accordingly. Dual permit regulations require two 2 separate CFEC permit holders to be present on a vessel to operate as a dual vessel with 200 fathoms of gear, and both signatures are required on fish tickets at the time of delivery.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? These proposals would have no effect on management for salmon escapement goals. It is not possible to determine if there would be a decrease in vessels or a change to the total amount of gear fished. Permit stacking would likely increase permit value and reduce permit availability to new fishery participants by an unknown amount.

BACKGROUND: When the limited entry permit system was implemented in 1974, an individual was allowed to own only one limited entry permit per fishery. House Bill 286 was passed into law in 2002, allowing an individual to own 2 commercial salmon permits in the same fishery. In 2006, House Bill 251 passed allowing the board to authorize additional gear with ownership of a second permit. These actions were taken to revitalize Alaska's salmon industry at a time when salmon exvessel prices were very low.

The legal gear limit for commercial drift gillnet vessels was 150 fathoms until the 2003 board meeting, when a regulation was adopted that allowed use of 200 fathoms of gear when 2 CFEC permit holders are on the same vessel and the vessel is marked accordingly (Table 75-1).

DEPARTMENT COMMENTS: The department is **NEUTRAL** on these proposals but notes that these proposals could make it more difficult for new fishery participants to obtain a CFEC limited entry permit and enter the fishery.

COST ANALYSIS: Approval of these proposals may result in an additional direct cost for a private person to participate in this fishery if CFEC permit values increase. Approval of these proposals is not expected to result in an additional cost to the department.

Table 75-1.–Bristol Bay dual permits fished by year (2003–2025).

Year	Drift	Permits	Dual Drift
	Total	Fished	Vessels
2003	1,867	1,389	ND
2004	1,860	1,426	ND
2005	1,862	1,526	ND
2006	1,859	1,567	a
2007	1,862	1,621	a
2008	1,863	1,636	a
2009	1,863	1,642	a
2010	1,863	1,731	360
2011	1,862	1,747	224
2012	1,862	1,740	326
2013	1,862	1,709	313
2014	1,863	1,751	312
2015	1,864	1,744	309
2016	1,864	1,714	353
2017	1,863	1,728	357
2018	1,863	1,735	372
2019	1,862	1,767	372
2020	1,862	1,724	382
2021	1,862	1,753	403
2022	1,863	1,760	403
2023	1,864	1,703	412
2024	1,862	1,670	453
2025 ^b	1,858	1,658	466
2003–2022 Avg.	1,863	1,671	345
2022–2025 Avg.	1,861	1,677	444

Note: ND = no data.

^a Dual permit tracking did not begin until 2010.

^b Preliminary data.

PROPOSAL 77 – 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

PROPOSED BY: Glenn Biernacki.

WHAT WOULD THE PROPOSALS DO? It would create a new permit category “E” to permanently combine 2 Bristol Bay drift gillnet permits (permit stacking) and limit the number of these “E” permits to 300.

WHAT ARE THE CURRENT REGULATIONS? Current regulations limit the length of a commercial drift gillnet to no more than 150 fathoms per vessel unless 2 CFEC drift gillnet permit holders are on board a vessel at the same time, the vessel and permit holders have registered as a dual operation, and the vessel is marked accordingly. Dual permit regulations require two 2 separate CFEC permit holders to be present on a vessel to operate as a dual vessel with 200 fathoms of gear, and both signatures are required on fish tickets at the time of delivery.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? Adopting this proposal would have no effect on management for salmon escapement goals. If the maximum 300 "E" permits were in use, it would permanently remove 30,000 fathoms of gillnet gear in Bristol Bay and permanently decrease the number of drift gillnet permits available. Permit stacking would likely increase permit value and reduce permit availability to new fishery participants by an unknown amount. This proposal could make it more difficult for new fishery participants to obtain a CFEC limited entry permit and enter the fishery.

BACKGROUND: When the limited entry permit system was implemented in 1974, an individual was allowed to own only one permit. House Bill 286, passed into law in 2002, allows an individual to own two commercial salmon permits in the same fishery. In 2006, House Bill 251 passed, allowing the board to authorize additional gear with ownership of a second permit. These actions were taken to revitalize Alaska’s salmon industry at a time when salmon exvessel prices were very low.

The legal gear limit for commercial drift gillnet vessels was 150 fathoms until 2003, when a regulation was adopted allowing 200 fathoms of gear when 2 CFEC permit holders are on the same vessel and the vessel is marked accordingly (Table 75-1).

DEPARTMENT COMMENTS: The department recommends the board take no action on this proposal. The board does not have authority to create a new limited entry permit type or cap the number of permits issued.

COST ANALYSIS: Approval of this proposal may result in an additional direct cost for a private person to participate in this fishery if CFEC permit values increase. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 79 – 5 AAC 06.331. Gillnet specifications and operations.

PROPOSED BY: William Albecker, Lisa Albecker, and Ugashik Village Set Netters.

WHAT WOULD THE PROPOSAL DO? Repeal the maximum offshore operation distance for commercial set gillnets in the Ugashik River. This would apply only to waters within statistical area 321-50 (Ugashik Village).

WHAT ARE THE CURRENT REGULATIONS? Currently, in the waters of the Ugashik River as defined in (5 AAC 06.331 (m)(8)), set gillnets must be operated within 800 feet of the 18-foot-high water mark.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow set gillnets to be operated further offshore in waters of statistical area 321-50. This could allow those operators to effectively fish a larger portion of the tide when the fishing period encompasses the entire cycle. If adopted, this will not impact management of the fishery.

BACKGROUND: The waters in front of Ugashik Village are within the Ugashik River and are separated from the main portion of the Ugashik District. This is a traditional fishing area for permit holders residing in the area, with 7 permits actively fished in 2025. Historically (through 2012), set gillnets here were allowed to operate within 1,000 feet from the 18-foot-high water mark. However, in July of 2011, the U.S. Coast Guard (USCG) found the entire 1,000-foot distance allowed by state regulation blocked the river enough to constitute an obstruction to navigation at nearly every tidal stage. The distance was therefore adjusted to 600 feet at the 2012 board meeting and increased to 800 feet at the 2022 board meeting.

Over the past several years, the shoreline along the village where the fishing sites are located has been filling in with sediment. This has reduced the fishable area to less than the 800 feet in regulation. With the changing river conditions, it is unclear if not having a maximum distance would comply with USCG navigation regulations.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

PROPOSAL 80 – 5 AAC 06.331 Gillnet specifications and operations.

PROPOSED BY: Jamie O'Connor.

WHAT WOULD THE PROPOSAL DO? Allow two CFEC set gillnet permit holders to operate together as a joint venture in the Bristol Bay Area under the conditions of a joint venture permit issued by the department.

WHAT ARE THE CURRENT REGULATIONS? In the Bristol Bay area, each commercial set gillnet permit holder must operate the unit of gear authorized by that permit and board regulations and deliver the fish caught with that gear.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would allow set gillnet joint ventures, but the proposed regulatory language does not change the amount of gear that may be operated or modify landing requirements. Set gillnet joint ventures would be operationally very similar to dual permit drift gillnet operations that are lawful in Bristol Bay. Dual permit operations are required to record the second permit number on ADFG fish tickets at the time of landing. The intent of this proposal is to allow two set gillnet permit holders to pool their fish and allow one permit holder to land fish caught by both permit holders on a single CFEC permit card, but the proposed regulatory language only speaks to gear operation and registration requirements, not landing requirements. If adopted with the proposed regulatory language, individual set gillnet permit holders would continue to be responsible for delivering fish caught in their own gear. This would not affect the department's ability to manage for established escapement goals.

BACKGROUND: Set gillnet joint ventures have been allowed in the Kodiak Management Area since 1985. This proposal contains regulatory language that is similar to the Kodiak regulatory language found in (5 AAC 18.331). In the Kodiak Management Area, joint venture set gillnet operations can configure their gear differently than single permit operations and in a way that makes it difficult to assign catch to individual permit holders, as such they have been allowed to land catch from both permit holders on a single CFEC permit.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. In analyzing this proposal, the department determined that (5 AAC 39.130) *Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels; transporting requirements*, should be amended to establish harvest reporting requirements for joint venture operations, similar to those in place for dual permit operations. (5 AAC 39.130) is promulgated under the commissioner's authority and can be amended outside the Board of Fisheries process.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is expected to result in additional cost and administrative time for the department to administer joint venture permits.

PROPOSAL 81 – 5 AAC 06.330. Gear.

PROPOSED BY: Reid Ten Kley.

WHAT WOULD THE PROPOSAL DO? Create a new gear type in Bristol Bay called stationary non-entanglement nets which have a mesh size of between two and one-half inches and three and one-half inches. They could be fished within 1,000 feet from shore and 300 feet from any other gear. There is a sunset date of December 1, 2028.

WHAT ARE THE CURRENT REGULATIONS? In Bristol Bay there are 2 commercial gear types that can be fished with their associated limited entry permits S03T, drift gillnets, and S04T, set gillnets. Stationary non-entanglement nets are not defined in regulation and are not listed under types of legal gear in statewide definitions. Department of Natural Resources (DNR) shore fishery leases are issued to holders of CFEC set gillnet limited entry permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? It is unknown how this gear type would affect harvest because the gear is not well described in the proposal. Management for escapement goals using time and area would likely remain the same.

BACKGROUND: Set and drift gillnets have been the only gear types used in the Bristol Bay commercial salmon fishery for decades. Recently set gillnet permit holders across the state have begun exploring alternative gear types to reduce king salmon intercept and increase efficiency/product quality. To date the board has authorized dipnets as the only alternative gear type for S04 permits.

DEPARTMENT COMMENTS: This proposal seeks to create a new, undefined gear type that may be used as an alternative to set gillnets by holders of CFEC set gillnet permits. Given the ambiguity in this proposal, potential changes to long-standing fishing practices, and potential for the proposed gear type to be perceived as a statutorily prohibited salmon trap, the department recommends the board **take no action** on this proposal. If the board adopts this proposal, the department recommends not adopting the sunset provision.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

VESSEL SPECIFICATIONS (10 PROPOSALS)

PROPOSALS 82, 83, 84, 85, 86, 87, 88, 89, 90, and 91 – 5 AAC 06.341. Vessel specifications and operations.

PROPOSED BY: Abe Williams (Proposals 82 & 83), Matt Marinkovich (Proposals 84 & 91), Robert Heyano (Proposal 85), Timothy Mikkelsen (Proposals 86, 87, 89 & 90), and Kevin Currier (Proposal 88).

WHAT WOULD THE PROPOSAL DO? Change vessel specifications when measuring the overall length of a fishing vessel.

WHAT ARE THE CURRENT REGULATIONS? Commercial salmon fishing vessels are limited to an overall length of 32 feet with allowances for attachments not integral to the structure of the vessel, including fish drop-out baskets, anchor rollers, gillnet rollers, trim tabs, outrives, or outrive guards. Anchor rollers cannot extend more than 8 inches beyond the overall length and cannot be more than 8 inches in width or height. Trim tabs cannot extend more than 18 inches beyond the transom.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? These would allow for more equipment attached to a vessel beyond the 32 feet overall length limit, which would increase the capacity of vessels. This would not change how the department manages for escapement goals with fishing time and area.

BACKGROUND: The 32-foot length limitation to commercial fishing vessels in Bristol Bay was established in 1949, though there have been some descriptive changes of that length throughout the years. The current regulation and description have been in effect since 1991. Common justifications found in proposals in favor of changing or removing the 32-foot limit include increased safety with larger vessels, greater economic efficiency because of larger holding capacity, and improved product quality with the increased size allowing installation of refrigeration for fish or increased capacity for icing/cooling of fish. Proposals to increase boat length limit have been before the board and failed in almost every cycle since 1991.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on these proposals.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

COMMITTEE OF THE WHOLE—GROUP 4: SPORT FISHERIES AND MISCELLANEOUS (12 PROPOSALS)

SPORT FISHERIES (11 PROPOSALS)

PROPOSAL 96 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Patricia Edel

WHAT WOULD THE PROPOSAL DO? This would prohibit the use of bait and multiple hooks in the Naknek River Drainage year-round.

WHAT ARE THE CURRENT REGULATIONS? The Naknek Drainage is open to sport fishing year-round. In flowing waters of the drainage from March 1-November 14, sport fishing gear is restricted to unbaited, artificial lures or flies. In the flowing waters upstream from an ADF&G regulatory marker located ½ mile upstream of Rapids Camp to ADF&G markers at Trefon’s cabin, including all waters within ¼ mile of all lake inlet and outlet streams has additional year-round sport fishing gear restrictions of unbaited single-hook, or artificial lures or flies. In drainage lakes, except for within ¼ mile of the lake inlet and outlet streams bait, multiple-hooks, artificial lures, or flies are allowed year-round.

The Naknek River drainage is closed year-round to sport fishing for king salmon upstream from an ADF&G markers located ½ mile above Rapids Camp to ADF&G markers at Trefon’s cabin at the outlet of Naknek Lake, although it is open to sport fishing for other species from June 8-April 9; From March 1-April 9 and from June 8-July 31, sport fishing gear is limited to unbaited, single-hook, artificial lures or flies with a gap between the point and shank of ½ inch or less and in this section, for the remainder of the year, only unbaited, single-hook, and artificial lures or flies may be used.

In waters open to king salmon sport fishing the bag and possession limit for king salmon 20 inches or longer is 3 king salmon of which only 1 can be 28 inches or longer. There is also a king salmon annual limit of 5 fish, over 20 inches in length from the entire Naknek River Drainage, and of those fish, only 3 can be over 28 inches or greater in length and annual limit recording requirements apply.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would result in decreased catch rates for anglers, and would prohibit tackle commonly used by anglers targeting Arctic grayling, Dolly Varden, Arctic char, rainbow trout, northern pike, and all five species of Pacific salmon year-round. Bait is already prohibited in the Naknek River Drainage from March 1 – November 14 and prohibiting bait year-round would adversely affect local watershed residents that harvest rainbow trout in small numbers through the ice in the winter under sport regulations. This may reduce angling effort on the river if anglers who use bait and multiple hooks choose not to fish.

BACKGROUND: Based on SWHS data, sport fishing effort in the Naknek River Drainage, 2020–2024, has ranged from a high of 16,047 angler days in 2022 to a low of 7,850 angler days in 2020,

with an average of 12,712 angler days. King salmon harvest during this time period has ranged from a high of 723 in 2021 to a low of 102 in 2022 with an average of 563 fish. At the 2022 Board of Fisheries meeting the bag and possession limit for king salmon was modified from a bag limit, for fish 20 inches or greater in length, of 3 fish per day and only 1 of which may be 28 inches or greater in length with an annual limit of 5 fish 20 inches or greater in length, to a bag limit, for fish 20 inches or greater in length, of 3 fish per day only 1 of which may be 28 inches or greater in length with an annual limit of 3 fish 20 inches or greater in length.

In 1990, the board adopted regulations for conservative management of wild rainbow trout in the Bristol Bay area. Conservative wild stock management does not necessarily preclude limited harvest of rainbow trout. Conservative wild stock management is predicated on both biological considerations and social concerns. Growth in the region's rainbow trout sport fisheries is inevitable, but by managing the area's wild rainbow trout stocks conservatively the potential for serious long-term resource problems is minimized. The *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), and *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222), and the region's regulations contain policies and regulations that protect the biological integrity of wild trout stocks and maximize their recreational benefit and economic potential. The Naknek River Drainage rainbow trout fishery is conservatively managed with no bait and single-hook regulations during peak fishing season, conservative bag limits, and a spawning season closure to maintain wild stocks. Use of multiple hooks is already prohibited from Rapids Camp to the outlet of Naknek Lake. The rainbow trout catch by anglers in the Upper Naknek River sport fishery from 2020-2024 ranged from a high of 11,652 in 2022 to a low of 6,500 in 2024 and averaged 8,573 fish.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. There is currently no biological or conservation concern related to the use of multiple hooks. The department has the authority to issue an emergency order prohibiting the use of bait to reduce catch rates for conservation when necessary. Adoption of this proposal would deviate from area-wide regulations and reduce the recreational benefit of the fishery with no measurable conservation benefit.

COST ANALYSIS: Adoption of this proposal may result in an additional direct cost for anglers who would need to purchase new tackle in order to participate in the fishery. Approval of this proposal is not expected to result in additional direct cost for the department.

PROPOSAL 97 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Ladd Nolin

WHAT WOULD THE PROPOSAL DO? This would prohibit barbed hooks, the use of bait, and the use of multiple hooks when sport fishing for rainbow trout and char in the Naknek River Drainage. This proposal would also prohibit removing any fish from the water prior to release in the Naknek River Drainage.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations requiring barbless hooks for finfish in Alaska. In flowing waters of the Naknek River from March 1-November 14: only unbaited, artificial lures or flies may be used. In the flowing waters upstream of the Naknek River from an ADF&G regulatory marker located ½ mile upstream of Rapids Camp, including all waters within ¼ mile of all lake inlets and outlet streams: Only unbaited, single-hook, artificial lures or flies may be used year-round. Upstream from ADF&G markers located ½ mile above Rapids Camp to ADF&G markers at Trefon’s cabin at the outlet of Naknek Lake: Closed year-round to king salmon fishing. June 8-April 9: Open to sport fishing. March 1-April 9 and June 8-July 31: Only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of ½ inch or less are allowed. For the remainder of the year, only unbaited, single-hook, artificial lures or flies may be used.

Rainbow trout bag limits from June 8 – October 31 are 1 per day, 1 in possession, must be less than 18 inches in length. From November 1 – June 7 the bag limit is 5 per day, 5 in possession, must be less than 18 inches in length. The bag limit for Arctic char from June 8 – October 31 is 3 per day, 3 in possession with no size limit. From November 1 – June 7 the bag limit is 10 per day, 10 in possession with no size limit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would likely reduce catch-and-release mortality by small but an unknown amount due, in part, to reduced air exposure if fish are kept in the water before release. It would prohibit tackle commonly used by anglers targeting Arctic char and rainbow trout year-round. Bait is already prohibited in the Naknek River Drainage from March 1 – November 14 and prohibiting bait year-round would adversely affect local watershed residents that harvest rainbow trout in small numbers through the ice in the winter under sport regulations. This would also result in decreased catch rates for anglers and increased regulatory complexity.

BACKGROUND: In 1990, the board adopted regulations for conservative management of wild rainbow trout in the Bristol Bay area. Conservative wild stock management does not necessarily preclude limited harvest of rainbow trout. Conservative wild stock management is predicated on both biological considerations and social concerns. Growth in the region's rainbow trout sport fisheries is inevitable, but by managing the area's wild rainbow trout stocks conservatively, the potential for serious long-term resource problems is minimized. From a social perspective, conservative wild stock management is consistent with the attitudes of most of the public presently using the resource. The *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222), and the region’s regulations contain policies and regulations that protect the biological integrity of wild trout stocks

and maximize their recreational benefit and economic potential. Little data exists on the effects of barbless hooks on rainbow trout abundance, however, the Naknek River Drainage rainbow trout fishery is conservatively managed with no bait and single-hook regulations, conservative bag limits, and a spawning season closure to maintain wild stocks. Bait is prohibited from March 1–November 14 and prohibiting bait year-round would adversely affect local watershed resident anglers that harvest rainbow trout in small numbers through the ice in the winter. The rainbow trout catch by anglers in the Upper Naknek River sport fishery from 2020-2024 ranged from a high of 11,652 in 2022 to a low of 6,500 in 2024 and averaged 8,573 fish.

An Idaho Fish and Game study by Schill and Scarpella (1997) reviewed extensive data across multiple fisheries and found no statistically significant difference in hooking mortality between barbed and barbless hooks, with mortality rates averaging 4.5% and 4.2% respectively. The authors concluded that barbed hooks do not pose a measurable biological disadvantage to fish populations. In more recent studies (Courter et al. 2023; Prystay et al. 2025; FSA23-01 Staff Analysis 2023), barbless hooks have been shown to decrease tissue damage and reduce handling and unhooking time, however the difference in catch-and-release mortality between barbed and barbless hooks is typically minimal. The difference is often less than a few percentage points for trout and Pacific salmon when artificial lures or flies are used.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. There is currently no biological or conservation concern for Naknek River rainbow trout or char. Adoption of this proposal would deviate from areawide regulations and increase regulatory complexity with no measurable conservation benefit. In fisheries where harvest is allowed, barbless hooks would negatively affect anglers' ability to harvest fish. Barbless hook regulations may disproportionately affect inexperienced and youth anglers.

COST ANALYSIS: Adoption of this proposal may result in an additional direct cost for anglers that would need to purchase new tackle in order to participate in the fishery. Approval of this proposal is not expected to result in additional direct cost for the department.

PROPOSAL 98 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Joey Klutsch, Patricia Edel

WHAT WOULD THE PROPOSAL DO? This would lower the sport fish annual limit for king salmon over 28 inches in length from 3 fish to 1 fish in the Naknek River.

WHAT ARE THE CURRENT REGULATIONS? For sport harvested king salmon 20 inches in length or longer: 3 per day, 3 in possession, only 1 of which may be 28 inches in length or longer. There is an annual limit of 5 king salmon over 20 inches in length taken from the entire Naknek River Drainage, only 3 of which may be over 28 inches in length. All sport harvested king salmon 20 inches in length or longer must be recorded. For king salmon less than 20 inches in length: 10 per day and 10 in possession with no annual limit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? There would be an unknown decrease in the annual sport harvest of king salmon over 28 inches in length in the Naknek River Drainage, as well as an increase in the rate of catch-and-release of king salmon over 28 inches in length.

BACKGROUND: Based on SWHS data, sport fishing effort in the Naknek River Drainage, 2020-2024, has ranged from a high of 16,047 angler days in 2022 to a low of 7,850 angler days in 2020, with an average of 12,712 angler days. King salmon harvest during this time period has ranged from a high of 723 in 2021 to a low of 102 in 2022 with an average of 563 fish. At the 2022 Board of Fisheries meeting the bag and possession limit for king salmon was modified from a bag limit for fish 20 inches or greater in length of three fish per day only one of which may be 28 inches or greater in length with an annual limit of 5 fish 20 inches or greater in length, to a bag limit for fish 20 inches or greater in length of three fish per day only one of which may be 28 inches or greater in length with an annual limit of 3 fish 20 inches or greater in length.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. This would create conservative sport fishing annual limits for king salmon in the face of statewide king salmon population declines; however, these sport fisheries are already managed conservatively under current regulations. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in additional direct cost for the department.

PROPOSAL 99 and 100 – 5AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Joey Klutsch.

WHAT WOULD THE PROPOSAL DO? This would move the regulatory marker referred to in regulation as “ADF&G marker located ½ mile above Rapids Camp” on the Naknek River from river mile 24.25 to river mile 23. This would result in that 1.25-miles downstream portion of the Naknek River to be closed year-round to king sport fishing (Figure 99-1).

WHAT ARE THE CURRENT REGULATIONS? Upstream from ADF&G markers located ½ mile above Rapids Camp to ADF&G markers at Trefon’s cabin at the outlet of Naknek Lake: Closed year-round to king salmon sport fishing. June 8-April 9: Open to sport fishing. March 1-April 9 and June 8-July 31: Only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of ½ inch or less are allowed. For the remainder of the year, only unbaited, single-hook, artificial lures or flies may be used.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would reduce the area open to sport fishing for king salmon by relocating the regulatory ADF&G marker located ½ mile above Rapids Camp downstream from approximately river mile 24.25 to river mile 23. An additional 1.25-mile section of the Naknek River currently open to king salmon sport fishing would become closed to king salmon sport fishing year-round. Closing this additional reach to king salmon fishing may reduce angler opportunity during the peak run timing in July, but could enhance protection for staging and migrating king salmon prior to reaching active spawning areas. The proposal could shift angling effort downstream and may have implications for localized crowding, access, and fishery distribution depending on annual run strength.

BACKGROUND: The regulatory marker referenced in regulation as the “ADF&G marker located ½ mile above Rapids Camp” on the Naknek River has been in place in sport fishing regulations dating back to at least 1972 and has served as a longstanding regulatory boundary within the drainage. The upper Naknek River has historically supported king salmon spawning activity, and concerns regarding conservation and stock protection in this area have been raised periodically. At the 2018 Board of Fisheries meeting the area upstream of the ADF&G marker located ½ mile above Rapids Camp was closed to king salmon sport fishing year-round and has remained to this day. This portion of the river includes transitional habitat where migrating king salmon begin holding prior to entering known spawning areas located further upstream. Historical radio telemetry and aerial survey data indicate that king salmon utilize habitats above river mile 24 for spawning, with primary spawning concentrations observed in the reach between river miles 26 and 30. However, fish may stage or hold in the area between river miles 23 and 24.25, particularly during periods of lower flow or warm water temperatures.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Moving the boundary and closing an additional 1.25 river miles to sport fishing would likely have little effect on angling behavior because this stretch of river is not the most popular location to fish for king salmon, although a small amount of fishing does take place here.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in additional direct costs for the department.

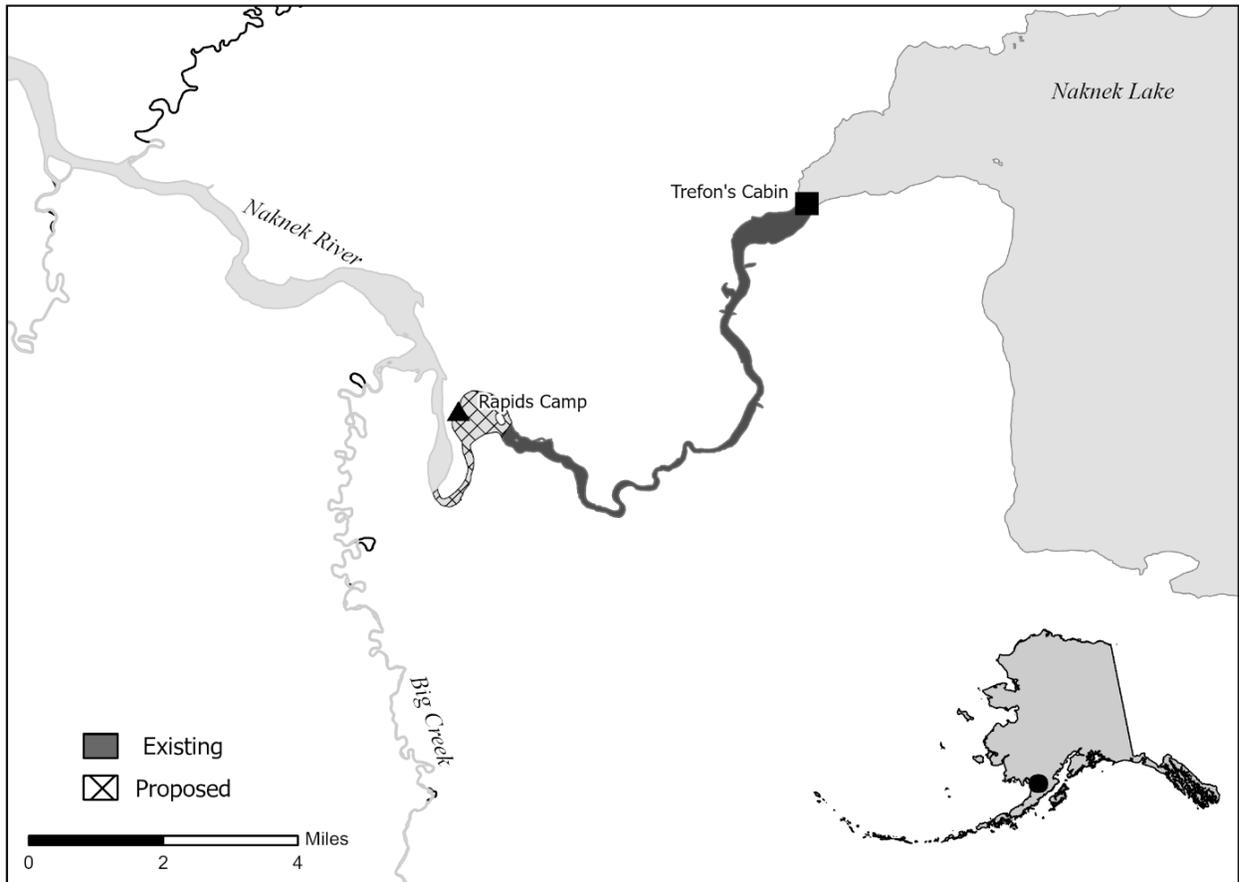


Figure 99-1.—Existing regulatory boundary shown in grey with proposed addition to this regulatory area shown with cross hatching.

PROPOSAL 185 – 5 AAC 06.XXX. New Section.

PROPOSED BY: Patricia Edel and Joey Klutsch.

WHAT WOULD THE PROPOSAL DO? This would establish a king salmon management plan for the Naknek River drainage.

WHAT ARE THE CURRENT REGULATIONS? For king salmon 20 inches or longer: 3 per day, 3 in possession, only 1 of which may be 28 inches or longer. There is an annual limit of 5 king salmon 20 inches or longer in freshwater, only 3 of which may be 28 inches or longer. All harvested king salmon 20 inches or longer must be recorded. For king salmon less than 20 inches the limit is 10 per day and 10 in possession. In all flowing waters of the Naknek drainage from March 1-November 14, only unbaited, artificial lures or flies may be used. In all flowing waters upstream from an ADF&G regulatory marker located ½ mile upstream of Rapids Camp, including all waters within ¼ mile of all lake inlet and outlet streams, only unbaited, single-hook, artificial lures or flies may be used year-round. Upstream from ADF&G markers located ½ mile above Rapids Camp to ADF&G markers at Trefon’s cabin at the outlet of Naknek Lake, closed year-round to king salmon fishing. June 8-April 9, open to sport fishing. March 1-April 9 and June 8-July 31, only unbaited, single-hook, artificial lures or flies with a gap between the point and shank of ½ inch or less are allowed. For the remainder of the year, only unbaited, single-hook, artificial lures or flies may be used. Within a ¼ mile radius of Big Creek, May 1-July 31, open to king salmon fishing. Bag limits and gear restrictions are the same as the remainder of the Naknek River. Big Creek upstream of its confluence with the Naknek River, open year-round to sport fishing for species other than king salmon and May 1-July 31, catch-and-release fishing only for king salmon.

The commercial salmon fishery is managed based on sockeye salmon escapement goals and allocation plans. The fishery is managed for escapement throughout the run so even when the lower-bound of the sockeye salmon escapement goal is met, there are still breaks in commercial fishing to allow for passage of later-returning sockeye salmon run components and additional escapement of king, coho, and chum salmon. In the allocation plan, all gillnet mesh size is restricted to 5 1/2 inches or less from June 1 through July 22 for the conservation of king salmon. Additionally, commercial drift gillnet fishing periods occur only between the 7-foot flood tide stage and 7-foot ebb tide stage for the conservation of king salmon. This protects king salmon that hold in the deeper water near the mouth of the Naknek River.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A management plan would provide the department guidance on how fisheries that impact Naknek River king salmon would be managed. This plan may include indicators or triggers at which regulatory actions may occur. The board would need to establish management strategies for Naknek River king salmon that consider sport, commercial, and subsistence fisheries. Inseason, abundance-based management of Naknek River king salmon is not possible due to the lack of an assessment program.

BACKGROUND: Historically, escapement of king salmon for the Naknek River was indexed by fixed-wing aerial surveys of the 4 primary spawning areas during the presumed peak of spawning in early to mid-August. Aerial counts were left unexpanded and were considered minimum estimates of escapement. These escapement surveys indicated the mainstem of the Naknek River, along with Big Creek, composes approximately 90% of the observed spawning escapement.

Surveys to estimate abundance for Naknek River king salmon ceased in 2009 due to budget shortfalls, and the escapement goal was dropped in 2015 due to concerns over the ability to reliably estimate abundance via aerial surveys.

The mesh size restriction in the commercial fishery of 5 1/2 inches maximum has been used since the early 1990s. Most commercial drift and set gillnet permit holders use a mesh size between 4 1/2 inches and 5 1/8 inches. In some years, closing commercial drift gillnet fishing periods during low tides has contributed to exceeding the Naknek River sockeye salmon escapement goal and kept the commercial drift gillnet harvest percentage below the allocation plan target.

From 2020 to 2025 the average commercial harvest of king salmon in the Naknek-Kvichak District was 905 fish. Home pack (personal use) in the Naknek-Kvichak District during these years, averaged 97 king salmon per year. From 2000 to 2019 the average commercial harvest of king salmon was 1,727 fish with a maximum harvest during this time series of 2,926 fish in 2015. Commercial and home pack harvest are based on fish tickets. From 2015 through 2024, the average subsistence harvest of king salmon was 513 fish per year. Since Bristol Bay is a mixed stock salmon fishery it is likely that a portion of the king salmon caught in Naknek-Kvichak commercial and subsistence fisheries originate from the Alagnak, Kvichak, and other rivers.

Based on statewide harvest survey data, sport fishing effort in the Naknek River from 2020-2024 ranged from a high of 16,047 angler days in 2022 to a low of 7,850 angler days in 2020 with an average of 12,712 angler days, although the majority of the effort is for species other than king salmon. King salmon catch in the Naknek River from 2020–2024 ranged from a high of 2,742 fish in 2024 to a low of 943 fish in 2022 with an average of 1,770 fish. King salmon harvest from 2020–2024 ranged from a high of 717 fish in 2021 to a low of 102 fish in 2022 with an average of 536 fish.

DEPARTMENT COMMENTS: The department is unable to support a prescriptive management approach because current stock assessment, monitoring tools, and management capacity are insufficient to inform such a plan. A management plan based on inseason estimates of Naknek River king salmon abundance could not be implemented because the department does not have a reliable and scientific sound Naknek River king salmon stock assessment program. Prior king salmon assessment programs in the Naknek River were largely post-season. Developing a king salmon management plan for the Naknek River may require a stock status analysis and a population estimate to be performed to inform the process. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would result in additional direct costs for the department.

PROPOSAL 101 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Tracy Vrem

WHAT WOULD THE PROPOSAL DO? This would prohibit the use of bait and multiple hooks in the Egegik and Ugashik river drainages.

WHAT ARE THE CURRENT REGULATIONS? There are currently no area-specific regulations restricting terminal tackle for the Egegik and Ugashik river drainages. Terminal tackle regulations for these drainages are the default statewide regulations. A closely attended single line attached to not more than one plug, one spoon, one spinner, or series of spinners, two artificial flies, or two hooks, may be used. All species other than rainbow trout and Arctic grayling are managed by Bristol Bay area regulations.

Drainage specific sport bag limits for the Egegik River Drainage for rainbow trout from June 8 – October 31 are 1 per day, 1 in possession with no size limit. From November 1 – June 7 the bag limit is 5 per day, 5 in possession, only 1 of which may be 20 inches in length or longer. For Arctic grayling at the Becharof Lake outlet, including the waters of Becharof Lake within ¼ mile of the outlet and the waters of the Egegik River within ¼ mile of the outlet retention is prohibited.

Drainage specific sport fish bag limits for the Ugashik River Drainage for rainbow trout from June 8 – October 31 are 1 per day, 1 in possession with no size limit. From November 1 – June 7 the bag limit is 5 per day, 5 in possession, only 1 of which may be 20 inches in length or longer. For Arctic grayling in Ugashik Narrows retention is prohibited. In the Ugashik River, sport fishing for Arctic grayling is prohibited year-round. In the remainder of the Ugashik Drainage the bag limit is 2 per day, 2 in possession with no size limit.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would result in decreased catch rates for anglers, increased regulatory complexity, and would prohibit a range of tackle commonly used by anglers targeting Arctic grayling, Dolly Varden, Arctic char, rainbow trout, northern pike, and all five species of Pacific salmon. This may reduce catch and release mortality by an unknown amount.

BACKGROUND: Based on SWHS data, sport fishing effort in the Ugashik River Drainage, from 2020–2024 has ranged from a high of 1,478 angler days in 2021 to a low of 217 angler days in 2023 with an average of 1,016 angler days (Table 101-1). Sport fishing effort in the Egegik River Drainage, 2020-2024 has ranged from a high of 3,014 angler days in 2022 to a low of 1,875 angler days in 2020 with an average of 2,387 angler days (Table 101-2). King salmon catch in the Egegik and Ugashik river drainages, from 2020–2024 has been low, and there has been no king salmon sport harvest in either drainage during this time period (Table 101-1 and 101-2). Coho salmon sport catch in the Egegik and Ugashik river drainages from 2020–2024 has ranged from a high of 8,696 (Egegik River) and 2,505 (Ugashik River) in 2021 and 2024 respectively to a low of 4,786 and 0 in 2024 and 2023 respectively with an average of 6,407 and 1,257 fish respectively (Table 101-1 and 101-2). Coho salmon sport harvest during this time period has ranged from a high of 5,310 and 766 both in 2022 to a low of 1,502 and 0 in 2020 and 2023 respectively with an average of 3,240 and 277 fish respectively (Table 101-1 and 101-2). Arctic grayling sport catch in the

Egegik and Ugashik river drainages from 2020–2024 has ranged from a high of 2,422 and 146 in 2021 and 2022 respectively to a low of 504 and 0 in 2023 and both 2021 and 2024 respectively with an average of 1,006 and 35 fish respectively (Table 101-1 and 101-2). There has been no Arctic grayling sport harvest in either drainage during this time period. In 1992 the Board of Fisheries added conservation measures for Arctic grayling in the Egegik and Ugashik river drainages by closing the Ugashik River year-round to sport fishing for Arctic grayling and establishing non-retention regulations at the outlet of Becherof Lake and in the Ugashik Narrows.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. There is currently no biological or conservation concern related to the use of multiple hooks. The department has the authority to issue an emergency order prohibiting the use of bait to reduce catch rates for conservation when necessary. Adoption of this proposal would deviate from areawide regulations, increase regulatory complexity, and reduce the recreational benefit and economic potential of the fishery with no measurable conservation benefit.

COST ANALYSIS: Adoption of this proposal may result in an additional direct cost for anglers that would need to purchase new tackle in order to participate in the fishery. Approval of this proposal is not expected to result in additional direct costs for the department.

Table 101-1.–Ugashik River sport fishing effort and king salmon, coho salmon, and Arctic grayling harvest, and catch, 2020-2024.

Year	Angler Days	King Salmon		Coho Salmon		Arctic Grayling	
		Harvest	Catch	Harvest	Catch	Harvest	Catch
2020	1,172	0	172	383	1,315	0	8
2021	1,478	0	26	81	351	0	0
2022	1,382	0	0	766	2,112	0	146
2023	217	0	145	0	0	0	21
2024	830	0	30	156	2,505	0	0
Average	1,016	0	75	277	1,257	0	35

Source: SWHS

Table 101-2.–Egegik River sport fishing effort and king salmon, coho salmon, and Arctic grayling harvest, and catch, 2020–2024.

Year	Angler Days	King Salmon		Coho Salmon		Arctic Grayling	
		Harvest	Catch	Harvest	Catch	Harvest	Catch
2020	1,875	0	139	1,502	5,471	0	763
2021	2,243	0	65	2,930	8,696	0	2,422
2022	3,014	0	0	5,310	8,270	0	336
2023	2,235	0	0	3,607	4,810	0	504
2024	2,567	0	36	2,849	4,786	0	1,004
Average	2,387	0	48	3,240	6,407	0	1,006

Source: SWHS

PROPOSAL 102– 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Jordan Larsen, Zackery Larsen

WHAT WOULD THE PROPOSAL DO? This would change the dates that bait is allowed in the Togiak River Drainage from July 15 – April 30 to July 11 – April 30. It would also move the boundary for the area closed year-round to king salmon sport fishing from all waters above the confluence of the Togiak River and Gechiak Creek to all waters above the confluence of the Togiak River and the Pungokepuk River (Figure 102-1).

WHAT ARE THE CURRENT REGULATIONS? Unbaited, single-hook, artificial lures or flies may be used year-round and from July 16-April 30, bait is allowed. For king salmon 20 inches or longer, no sport retention is allowed. All sport caught king salmon 20 inches or longer may not be removed from the water and must be released immediately. For king salmon less than 20 inches, the limit is 10 per day, 10 in possession. Waters upstream of the confluence of Gechiak Creek and the Togiak River are closed year-round to king salmon fishing.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The use of bait on the Togiak River would be allowed 5 days sooner, the lower boundary for the area closed to sport fishing for king salmon would be moved upstream to the Togiak National Wildlife Refuge boundary at the mouth of the Pungokepuk River. The area open to king salmon sport fishing would increase to include approximately 5 miles of river that is currently closed to sport fishing.

BACKGROUND: Historically most king salmon sport fishing takes place below the Pungokepuk River. Based on the SWHS, in the Togiak River drainage the estimated king salmon sport catch from 2020-2024 ranged from a high of 2,675 in 2020 to a low of 212 in 2024, with an average of 2,692 fish. The sport harvest of king salmon from 2020-2024 has ranged from a high of 836 in 2021 to a low of 0 in 2024, with an average of 405. Angler effort for the Togiak River Drainage has been in decline from a high of 3,689 in 2021 to a low of 2,077 in 2024 with a recent 5-year average of 2,692 angler-days (Table 102-1). At the 2022 Bristol Bay Board of Fisheries meeting, new regulations were created prohibiting the use of bait, the sport retention of king salmon over 20 inches in length, and establishing all waters above the confluence of the Togiak River and Gechiak Creek as closed to king salmon sport fishing. At the 2023 statewide Board of Fisheries meeting, an ACR was adopted that reinstated the use of bait in the sport fishery from July 16 – April 30.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. Additional proposed days of bait use overlap with the tail end of the king salmon run and may risk some king salmon being caught with bait; however, the regulations do not allow for sport retention of king salmon over 20 inches in length, so biological impact would be minimal. Moving the boundary to the Pungokepuk River would be consistent with local patterns of sport use and would align the boundary with the Togiak National Wildlife Refuge boundary, providing for regulatory uniformity.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in additional direct costs for the department.

Table 102-1.–Togiak River sport fishing effort and king salmon harvest, and catch, 2020–2024.

Year	King Salmon		
	Angler Days	Harvest	Catch
2020	2,155	425	139
2021	3,689	836	65
2022	3,050	0	0
2023	2,491	0	0
2024	2,077	0	36
Average	2,692	252	48

Source: SWHS

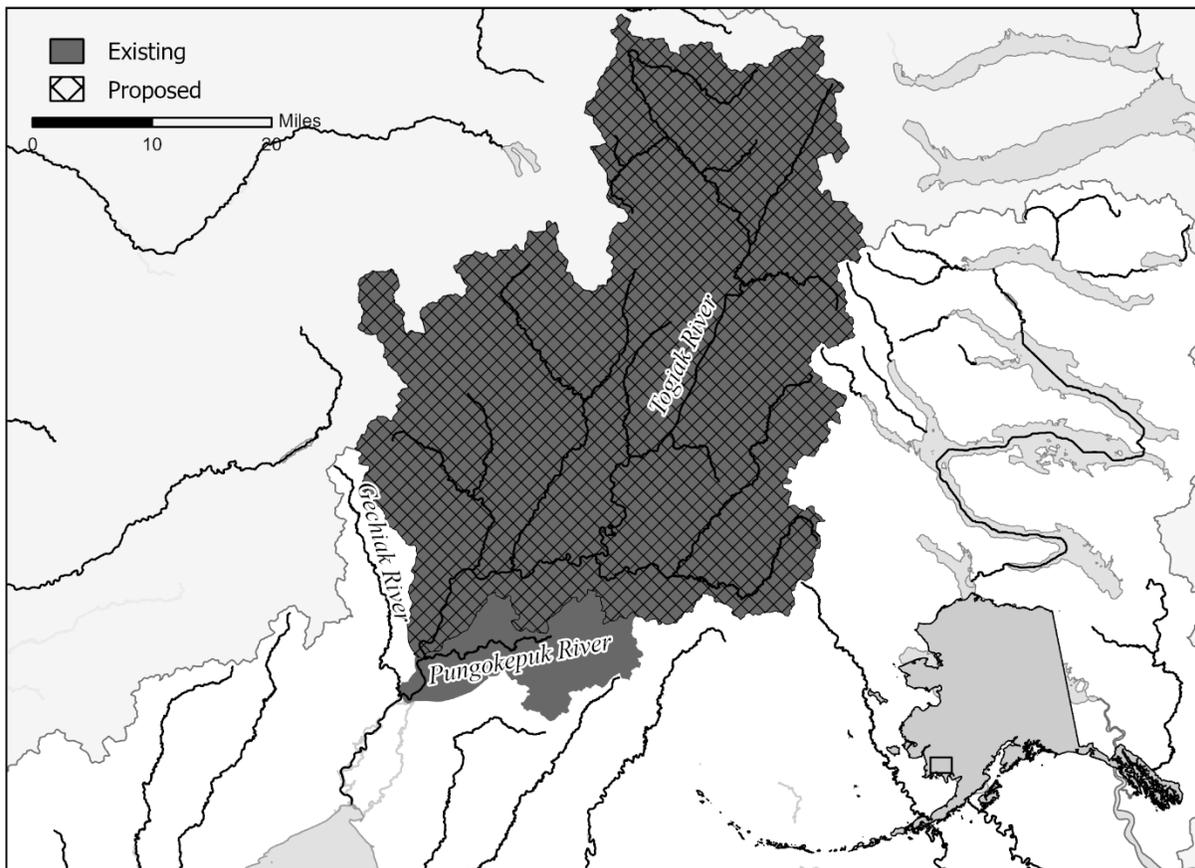


Figure 102-1.–Existing regulatory area closed to fishing shown in grey with proposed regulatory area shown with cross hatching.

PROPOSAL 103– 5AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Pat Vermillion and Scott Schumacher of Royal Coachman Lodge.

WHAT WOULD THE PROPOSAL DO? This proposal would prohibit placing in the water any substance for attracting fish by scent (chumming) by guides and guided anglers within all Bristol Bay freshwaters.

WHAT ARE THE CURRENT REGULATIONS? In any freshwaters closed to the use of bait, sport fishing guides and guided anglers are prohibited from placing in the water any substance (bait) for the purpose of attracting fish by scent.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This would prohibit chumming by guides and guided anglers, in all waters of Bristol Bay. Catch and harvest of targeted species may decrease by an unknown amount.

BACKGROUND: In 2012, the board of fisheries (board) adopted a regulation that modified the definition of bait in fresh waters of Bristol Bay to include any substance placed in fresh water by a person for the purpose of attracting fish by scent. The intent of this regulation was to prohibit anglers and sport fishing guides from placing fish parts in the water for the purpose of attracting fish in fresh waters where bait is prohibited. After the current regulation became effective in 2013, subsistence users in the Nondalton and Newhalen areas became concerned that it could result in citations for local residents who harvest non-salmon species under sport fishing regulations near traditional fish camps where salmon are harvested and processed under subsistence regulations. It is common practice for subsistence users at traditional fish camps in the area to catch and harvest non-salmon species downstream of where subsistence caught salmon are being processed and fish parts are properly disposed of in the water. This is why the current regulation affects guides and guided anglers only.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal given little apparent biological benefit and increased regulatory complexity.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in additional direct costs for the department.

PROPOSAL 104 – 5 AAC 67.022. Special provisions for seasons, bag, possession, and size limits, and methods and means in the Bristol Bay Area.

PROPOSED BY: Bristol Adventures

WHAT WOULD THE PROPOSAL DO? This would prohibit the use of barbed hooks in the Moraine Creek, Kulik River, American Creek, and Brooks River drainages from June 8–October 31.

WHAT ARE THE CURRENT REGULATIONS? Currently there are no regulations requiring barbless hooks for finfish in Alaska, but anglers may choose to crimp barbs if they prefer. Area-specific sport regulations are as follows:

Kulik River: April 10–June 7 closed to sport fishing to protect spawning rainbow trout, June 8–October 31 retention of rainbow trout prohibited. June 8–April 9 only unbaited single-hook artificial lures or flies may be used. November 1–April 9 rainbow trout limit of 5 per day, 5 in possession, must be less than 18 inches in length.

Moraine Creek: April 10–June 7 closed to sport fishing to protect spawning rainbow trout, June 8–October 31 retention of rainbow trout prohibited, only unbaited single-hook artificial flies may be used. November 1–April 9 rainbow trout limit of 5 per day, 5 in possession, must be less than 18 inches in length.

American Creek: April 10–June 7 closed to sport fishing to protect spawning rainbow trout, June 8–October 31 retention of rainbow trout prohibited. November 1–April 9 rainbow trout limit of 5 per day, 5 in possession, only 1 of which may be 20 inches in length or longer.

Brooks River: April 10–June 7 closed to sport fishing to protect spawning rainbow trout. Rainbow trout, June 8–October 31: Catch-and-release fishing only. All rainbow trout caught must be released immediately. November 1–June 7: 5 per day, 5 in possession, must be less than 18 inches in length. In all flowing waters of the Brooks River Drainage, including lake waters within ¼ mile of all inlet and outlet streams and waters of Naknek Lake within ¼ mile of the outlet of the Brooks River: June 8–October 31: Only unbaited, single-hook, artificial flies may be used. Rainbow trout: November 1–April 9: 5 per day, 5 in possession, must be less than 18 inches in length. The outlet of Brooks Lake downstream to the bridge at Brooks Camp: Catch-and-release fishing only. All fish species caught must be released immediately.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If adopted, this would result in decreased catch rates for anglers and increased regulatory complexity.

BACKGROUND: In 1990, the board adopted regulations for conservative management of wild rainbow trout in the Bristol Bay area. Conservative wild stock management does not necessarily preclude limited sport harvest of rainbow trout. Conservative wild stock management is predicated on both biological considerations and social concerns. Growth in the region's rainbow trout sport fisheries is inevitable, but by managing the area's wild rainbow trout stocks conservatively, the potential for serious long-term resource problems is minimized. The *Statewide Management Standards for Rainbow Trout* (5 AAC 75.220), and *Policy for the Management of Sustainable Wild Trout Fisheries* (5 AAC 75.222) and the region's regulations contain policies and regulations that protect the biological integrity of wild trout stocks and maximize their recreational benefit and economic potential. The drainages in question are conservatively managed with no bait and single-hook regulations, non-retention during peak season, conservative bag limits, and a spawning

season closure to maintain wild stocks. The rainbow trout catch by anglers in the Kulik River sport fishery from 2020–2024 ranged from a high of 19,434 in 2022 to a low of 5,169 in 2024 and averaged 13,111 fish (Table 104-1). The rainbow trout catch by anglers in the Moraine Creek sport fishery from 2020–2024 ranged from a high of 10,586 in 2020 to a low of 4,194 in 2023 and averaged 6,342 fish (Table 104-2). The rainbow trout catch by anglers in the American Creek sport fishery from 2020–2024 ranged from a high of 10,331 in 2021 to a low of 5,229 in 2024 and averaged 7,087 fish (Table 104-3). The rainbow trout catch by anglers in the Brooks River sport fishery from 2020–2024 ranged from a high of 8,322 in 2021 to a low of 3,613 in 2024 and averaged 6,350 fish (Table 104-4).

The Idaho Fish and Game study by Schill and Scarpella (1997) reviewed extensive data across multiple fisheries and found no statistically significant difference in hooking mortality between barbed and barbless hooks, with mortality rates averaging 4.5% and 4.2% respectively. The authors concluded that barbed hooks do not pose a measurable biological disadvantage to fish populations. In more recent studies (Courter et al. 2023; Prystay et al. 2025; FSA23-01 Staff Analysis 2023), barbless hooks have been shown to decrease tissue damage and reduce handling and unhooking time, however the difference in catch-and-release mortality between barbed and barbless hooks is typically minimal. The difference is often less than a few percentage points for trout and Pacific salmon when artificial lures or flies are used.

DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. There is currently no biological or conservation concern related to the use of barbed hooks. Adoption of this proposal would deviate from area-wide regulations and increase regulatory complexity with minimal measurable conservation benefit. In fisheries where harvest is allowed, barbless hooks would negatively affect an angler’s ability to harvest fish. Barbless hook regulations may disproportionately affect inexperienced and youth anglers.

COST ANALYSIS: Adoption of this proposal may result in an additional direct cost for anglers that would need to purchase new tackle or modify existing tackle to participate in the fishery. Approval of this proposal is not expected to result in additional direct costs for the department.

Table 104-1.–Kulik River sport fishing effort and rainbow trout harvest, and catch, 2020–2024.

Year	Rainbow Trout		
	Angler Days	Harvest	Catch
2020	1,359	0	13,337
2021	2,502	0	15,782
2022	2,004	0	19,434
2023	1,631	0	11,835
2024	2,852	0	5,169
Average	2,070	0	13,111

Source: SWHS

Table 104-2.–Moraine Creek sport fishing effort and rainbow trout harvest, and catch, 2020–2024.

Year	Rainbow Trout		
	Angler Days	Harvest	Catch
2020	1,600	53	10,586
2021	1,310	54	6,367
2022	1,602	53	6,220
2023	1,281	76	4,194
2024	1,830	0	4,341
Average	1,525	47	6,342

Source: SWHS

Table 104-3.–American Creek sport fishing effort and rainbow trout harvest, and catch, 2020–2024.

Year	Rainbow Trout		
	Angler Days	Harvest	Catch
2020	737	51	5,541
2021	1,986	0	10,331
2022	1,983	0	8,775
2023	1,349	0	5,560
2024	1,843	0	5,229
Average	1,580	10	7,087

Source: SWHS

Table 104-4.–Brooks River sport fishing effort and rainbow trout harvest, and catch, 2020–2024.

Year	Rainbow Trout		
	Angler Days	Harvest	Catch
2020	1,694	53	4,933
2021	2,186	0	8,322
2022	2,230	0	6,862
2023	3,788	0	8,020
2024	1,849	0	3,613
Average	2,349	11	6,350

Source: SWHS

PROPOSAL 105 – 5 AAC 06.XXX. New Section.

PROPOSED BY: Nanci Morris Lyon

WHAT WOULD THE PROPOSAL DO? Adopt a king salmon management plan for streams located in Bristol Bay that do not currently have management plans in place and have active sport, subsistence, or personal use fisheries associated with them, such as the Kvichak, Alagnak, Naknek, Igushik, Ugashik, Sandy, and Meshik drainages.

WHAT ARE THE CURRENT REGULATIONS? There are no escapement goals for king salmon in any Bristol Bay drainage other than the Nushagak River. The only king salmon management plans in Bristol Bay are the *Nushagak-Mulchatna King Salmon Management Plan* (5 AAC 06.361) and the *Nushagak District King Salmon Stock of Concern Management Plan* (5 AAC 06.391). Regulations within the Bristol Bay management area are as follows; May 1-July 31, open to king salmon fishing. There is an annual limit of 5 king salmon 20 inches or longer in Bristol Bay salt and fresh waters combined. Of those 5 total king salmon, no more than 4 may be harvested from the Nushagak/Mulchatna River Drainage, and no more than 2 may be harvested from the Wood River Drainage. If you retain a king salmon 20 inches or longer, you must immediately record that harvest. In freshwater, fish 20 inches or longer: 3 per day, 3 in possession, only 1 of which may be 28 inches or longer. Fish less than 20 inches, 10 per day, 10 in possession. King salmon removed from the water must be retained. Any king salmon removed from the freshwater drainages of Bristol Bay from Cape Mensehikof to Cape Newenham must be retained and become part of the bag limit of the person who originally hooked it. If you intend to release a king salmon, you may not remove it from the water before releasing it. In saltwaters, the king salmon limit is 3 per day, 3 in possession, only 2 of which may be 28 inches or longer. The Sandy and Meshik Rivers mentioned in this proposal are not in the Bristol Bay Management Area. Actions impacting the Alaska Peninsula and Aleutian Islands Area regulations (5 AAC 65.02) will be heard at the February Board of Fisheries meeting. Bag limits for king salmon in the Sandy River are 1 per day with a 2 fish annual limit for king salmon 20 inches or greater in length. King salmon less than 20 inches in length have a bag limit of 10 per day, no annual limit. The king salmon season for the Alaska Peninsula is from January 1 through July 25, annually, and tackle is restricted to single hook, artificial lures in the drainage, year-round. The Meshik River has a bag limit of 2 king salmon per day and 5 king salmon annually, 20 inches or greater, and 10 king salmon per day, no annual limit, for fish less than 20 inches, from January 1 through July 25. The use of bait and treble hooks are allowed year-round.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Management strategies would need to be established for the drainages mentioned above. A plan could be simple and outline bag, possession, and annual limits as well as time and area and terminal tackle regulations. A plan could also include subsistence and commercial fisheries management actions and include escapement goals. This could require a combination of aerial spawning surveys and weirs in conjunction with statistical analysis that could be used to establish sustainable escapement goals (SEGs).

BACKGROUND: There is little stock assessment data available for king salmon in these drainages. There are longstanding sockeye salmon assessment programs in place for these drainages, but in many cases king salmon spawn below assessment projects or are not well assessed

via aerial survey. There are no directed commercial fisheries for king salmon originating from these drainages, however king salmon are harvested in these fisheries.

Management of the subsistence, commercial, and sport fisheries for Nushagak king salmon stocks is governed by the *Nushagak–Mulchatna King Salmon Management Plan* (5 AAC 06.361) and the *Nushagak District King Salmon Stock of Concern Management Plan* (5 AAC 06.391). The *Nushagak–Mulchatna King Salmon Management Plan* (5 AAC 06.361) was first adopted by the board in January 1992 and most recently modified during the 2023 meeting. The *Nushagak District King Salmon Stock of Concern Management Plan* (5 AAC 06.391) was adopted by the board in 2023.

Based on SWHS data, sport fishing effort in the Kvichak River from 2020–2024 has ranged from a high of 5,363 angler days in 2024 to a low of 2,863 angler days in 2020 with an average of 4,383 angler days. King salmon catch in the Kvichak River from 2020–2024 has ranged from a high of 684 in 2022 to a low of 19 in 2020 with an average of 455 fish. King salmon harvest during this time period has ranged from a high of 169 in 2023 to a low of 0 in both 2021 and 2024 with an average of 40 fish (Table 105-1).

Based on SWHS data, sport fishing effort in the Alagnak River from 2020–2024 has ranged from a high of 7,356 angler days in 2021 to a low of 4,447 angler days in 2023 with an average of 5,608 angler days. King salmon catch in the Alagnak River from 2020–2024 has ranged from a high of 1,669 in 2024 to a low of 571 in 2023 with an average of 1,019 fish. King salmon harvest during this time period has ranged from a high of 239 in 2024 to a low of 16 in 2020 with an average of 160 fish (Table 105-1).

Based on SWHS data, sport fishing effort in the Naknek River from 2020–2024 has ranged from a high of 16,047 angler days in 2022 to a low of 7,850 angler days in 2020 with an average of 12,712 angler days. King salmon catch in the Naknek River from 2020–2024 has ranged from a high of 2,742 in 2024 to a low of 943 in 2022 with an average of 1,770 fish. King salmon harvest during this time period has ranged from a high of 717 in 2021 to a low of 102 in 2022 with an average of 536 fish (Table 105-1).

Based on SWHS data, 2023 was the only year in which data is available for the Igushik River due to no responses to the SWHS. This is likely due to a low amount of annual sport fishing effort on the river. Effort was estimated at 40 angler days and there was no catch or harvest of king salmon (Table 105-1).

Based on SWHS data, sport fishing effort in the Ugashik River from 2020–2024 has ranged from a high of 1,478 angler days in 2021 to a low of 164 angler days in 2023 with an average of 1,005 angler days. King salmon catch in the Ugashik River from 2020–2024 has ranged from a high of 172 in 2020 to a low of 0 in both 2022 and 2024 with an average of 69 fish. There was no king salmon harvest during this time period (Table 105-1).

Based on SWHS data, sport fishing effort in the Togiak River from 2020–2024 has ranged from a high of 3,688 angler days in 2021 to a low of 2,077 angler days in 2024 with an average of 2,692 angler days. King salmon catch in the Togiak River from 2020–2024 has ranged from a high of

2,675 in 2020 to a low of 212 in 2024 with an average of 1,364 fish. King salmon harvest during this time period has ranged from a high of 836 in 2021 to a low of 0 in 2024 with an average of 405 fish (Table 105-1).

Based on SWHS data, sport fishing effort in the Sandy River from 2020–24 has ranged from a high of 2,158 angler days in 2021 to a low of 338 angler days in 2023 with an average of 854 angler days. King salmon catch in the Sandy River from 2020–2024 has ranged from a high of 867 in 2024 to a low of 0 in 2020 with an average of 368 fish. There was no king salmon harvest during this time period (Table 105-1).

Based on SWHS data, sport fishing effort in the Meshik River from 2020–2024 has ranged from a high of 622 angler days in 2022 to a low of 35 angler days in 2023 with an average of 285 angler days. King salmon catch in the Meshik River from 2020–2024 has ranged from a high of 1,812 in 2022 to a low of 58 in 2023 with an average of 697 fish. King salmon harvest during this time period has ranged from a high of 136 in 2022 to a low of 0 in both 2021 and 2024 with an average of 41 fish (Table 105-1).

DEPARTMENT COMMENTS: The department is unable to support a prescriptive management approach because current stock assessment, monitoring tools, and management capacity are insufficient to inform such a plan. Creating new king salmon management plans for the rivers mentioned above would require the department and the board to comprehensively evaluate the current sport, commercial, and subsistence fisheries and develop regulations, bag, possession, and annual limits, and possibly develop escapement goal ranges for these systems. Stock status analysis and population estimates may need to be performed to inform the process. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal would result in additional direct costs for the department.

Table 105. Kvichak, Alagnak, Naknek, Igushik, Ugashik, Togiak, Sandy, Meshik Rivers king salmon sport harvest, and catch, 2020–2024.

Year	Kvichak River		Alagnak River		Naknek River		Igushik River ^a		Ugashik River		Togiak River		Sandy River ^b		Meshik River ^b	
	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch	Harvest	Catch
2020	8	19	16	873	613	1,680	ND	ND	0	172	425	2,675	ND	ND	ND	ND
2021	0	650	180	1,383	717	1,113	ND	ND	0	26	836	2,336	ND	ND	ND	ND
2022	23	684	165	599	102	943	ND	ND	0	0	477	1,112	ND	ND	ND	ND
2023	169	344	201	571	711	2,372	0	0	0	145	286	486	ND	ND	ND	ND
2024	0	580	239	1,669	535	2,742	ND	ND	0	0	0	212	ND	ND	ND	ND
Average	40	455	160	1,019	536	1,770	0	0	0	69	405	1,364	ND	ND	ND	ND

Source: SWHS

Note: ND = no data available

^a Few responses to the SWHS increase the variability of this data

^b Responses to the SWHS too low to report.

MISCELLANEOUS (1 PROPOSAL)

PROPOSAL 188 – 5 AAC 27.865 Bristol Bay Herring Management Plan

PROPOSED BY: Alaska Board of Fisheries.

WHAT WOULD THE PROPOSAL DO? Reallocate 15% of the unharvested Togiak sac roe herring guideline harvest level (GHL) to the Dutch Harbor food and bait fishery if less than 90% of the Togiak sac roe GHL level is harvested by May 31.

WHAT ARE THE CURRENT REGULATIONS? Three management plans regulate the Dutch Harbor herring fishery: (1) the *Bering Sea Herring Fishery Management Plan* (5 AAC 27.060) mandates that if any of the southwest Alaska herring stocks between the Port Clarence and Togiak Districts are below their minimum threshold, the Dutch Harbor food and bait fishery will be closed for the season; (2) the *Bristol Bay Herring Management Plan* (5 AAC 27.865) establishes a 7% allocation of the Togiak District’s sac roe herring harvest to the Dutch Harbor food and bait fishery; and (3) the *Dutch Harbor Food and Bait Herring Fishery Management Plan* (5 AAC 27.655) which subtracts excess tonnage from the following year’s allocation if the given year’s fishery exceeds its current guide line harvest level (GHL). Togiak District herring fisheries are managed in accordance with the *Bristol Bay Herring Management Plan* (5 AAC 27.865), which specifies a maximum allowable exploitation rate of 20% and allocates the harvestable surplus among all the fisheries harvesting Togiak herring stocks.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL IS ADOPTED? This would increase the Dutch Harbor food and bait GHL during years when less than 90% of the Togiak sac roe herring GHL is harvested. For example, no Togiak sac roe herring was harvested in 2025, and as such, the 2025 Dutch Harbor food and bait GHL would have increased from 3,098 tons to 9,272 tons (Table 188-1) under this proposal. This will provide a greater harvest opportunity, increase the value of the fishery, and could attract additional markets and fishers into the Dutch Harbor food and bait fishery.

BACKGROUND: The first documented herring fisheries in the Eastern Aleutian Islands occurred from 1929 through 1938 and again in 1945. From 1939 through 1944, and again in 1946 through 1980, no herring fisheries took place. Since 1981 the Eastern Aleutian Islands herring fishery, now known as the Aleutian Islands “Dutch Harbor” herring food and bait fisheries, has occurred annually. During the 1981 and 1982 seasons, there were no harvest restrictions.¹ From 1983 to 1985 the board implemented a harvest ceiling of 3,527 tons. In 1986, the harvest ceiling was reduced from 3,527 tons to 2,453 tons over concern for depressed Western Alaska herring stocks. In 1988, the board implemented the *Bering Sea Herring Fishery Management Plan* (5 AAC 27.060(c) and (d)) that established the criteria for calculating the Dutch Harbor food and bait herring allocation. The plan directs the department to manage the fishery so that the overall exploitation of a herring stock should not exceed 20% of the spawning biomass. The dominant stock harvested in the Dutch Harbor food and bait fishery is from the Togiak spawning stock.²

¹ Schwarz, L. 1988. Peninsula/Aleutians herring sac-roe fishery report to the Board of Fisheries. Alaska Department of Fish and Game, Commercial Fisheries Division, Regional Information Report 4K88-3, Kodiak

² Rowell, K. A., H. J. Geiger, and B. G. Bue. 1991. Stock Identification of Pacific herring in the eastern Bering Sea trawl bycatch and the Dutch Harbor directed food and bait fishery. Proc. Int. Herring Symposium. Alaska Sea Grant Report, No 91-01, 1991, pp 255-278

An allocation plan between the Togiak sac roe fishery and spawn on kelp fishery, and the Dutch Harbor food and bait fishery was established to prevent harvest from exceeding 20% of spawning biomass estimates. The Dutch Harbor food and bait fishery was allocated 7% of Togiak District's harvestable biomass after deducting 1,500 tons for the Togiak District Spawn-on-kelp fishery (5 AAC 27.865 (b)(7)).

The commercial food and bait fishery for Pacific herring in the Alaska Peninsula-Aleutian Islands Management Area (Registration Area M) can occur within the Unimak, Akutan, Unalaska, Umnak, and Adak Districts. The Dutch Harbor food and bait herring fishery takes place from noon June 24 until February 28.

Since 2011, the Dutch Harbor food and bait GHL has ranged from 1,606 tons in 2011 to 4,900 tons in 2022 and averaged 3,690 tons over the last five years (Table 188-2). The harvest ranged from 1,120 tons in 2024 to 3,152 tons in 2025 and averaged 2,147 tons over the last five years (Table 188-2). The 2025 GHL was 3,098 tons and 3,152 tons were harvested (Table 188-2). No sac roe herring have been harvested in the Togiak District since 2022 (Table 188-1). Over the past decade 69% of the GHL has been taken on average, annually (Table 188-2).

The Western Alaska herring biomass is comprised of multiple herring stocks, and the Togiak stock is by far the largest, making up approximately 77%³ of the Western Alaska herring biomass. Herring spawn in nearshore areas in the spring, then migrate to overwintering areas on the outer eastern Bering Sea shelf, thus the spatial distributions of Western Alaska herring can vary substantially depending on environmentally driven changes to seasonal migration routes. Herring accessible to the Dutch Harbor food and bait fishery are likely comprised of a combination of stocks, and the stock composition likely varies interannually; however, there are no data to inform annual proportions by stock.

DEPARTMENT COMMENTS: The department **SUPPORTS** the concept of providing additional opportunity to harvest underutilized Togiak herring. This proposal would increase the overall harvest opportunity on Western Alaska herring stocks; however, because all Western Alaska herring stocks are poorly assessed and biomass estimates have substantial uncertainty, relative stock-specific conservation concerns associated with higher overall harvests are unknown. Because the Dutch Harbor food and bait herring GHL is based on the Togiak herring biomass, the most effective tool in conserving mixed stocks of herring harvested in Dutch Harbor, if conservation concerns arise, is reducing the Togiak herring exploitation rate. The department is **NEUTRAL** on the allocative aspects of this proposal.

COST ANALYSIS: Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery. Approval of this proposal is not expected to result in an additional cost to the department.

³ S. Dressel letter to the North Pacific Fishery Management Council for the purpose of establishing the 2017–2025 prohibited species catch limits per Amendment 16A of the Bering Sea/Aleutians Islands Groundfish FMP

Table 188-1.–Togiak District sac roe GHL and harvest (tons), Dutch Harbor food and bait GHL (7%) and proposed roll-over Togiak GHL (15%), 2011–2025.

Year	Togiak GHL	Harvest	Remaining GHL	% of GHG	Dutch FB GHL (7%)	Proposed Roll-over GHL (15%)	Total Dutch FB GHL
2011	24,805	22,877	1,928	92%	1,606	0	1,606
2012	21,622	17,021	4,601	79%	1,627	690	2,317
2013	30,056	27,610	2,446	92%	2,082	0	2,082
2014	27,890	25,560	2,330	92%	2,099	0	2,099
2015	29,012	21,396	7,616	74%	2,184	1,142	3,326
2016	28,782	14,879	13,903	52%	2,166	2,085	4,251
2017	22,943	17,129	5,814	75%	1,727	872	2,599
2018	24,042	16,383	7,659	68%	1,810	1,149	2,959
2019	26,930	22,746	4,184	84%	2,027	628	2,655
2020	38,749	*	*	*	2,917	*	*
2021	42,639	*	*	*	3,209	*	*
2022	65,107	*	*	*	4,900	*	*
2023	57,419	0	57,419	0%	4,322	8,613	12,935
2024	41,707	0	41,707	0%	2,920	6,256	9,176
2025	41,163	0	41,163	0%	3,098	6,174	9,272

Note: (*) = Confidential data

Table 188-2.-Dutch Harbor food and bait GHL and Harvest, (tons) 2011–2025.

Year	Number of Permits	GHL	Harvest	% of GHL
2011	*	1,606	*	*
2012	*	1,627	*	*
2013	3	2,082	1,764	85%
2014	3	2,099	1,645	78%
2015	3	2,184	1,972	90%
2016	*	2,166	*	*
2017	3	1,727	1,270	74%
2018	*	1,810	*	*
2019	4	2,027	1,805	89%
2020	*	2,917	*	*
2021	*	3,209	*	*
2022	4	4,900	2,170	44%
2023	*	4,322	*	*
2024	3	2,920	1,120	38%
2025	3	3,098	3,152	102%
10-year avg.	3	2,910	1,903	69%
5-year avg.	3	3,690	2,147	61%

Notes: (*) = Confidential Data