

Submitted by: Omar Keval

Community of Residence: Snohomish

I have been fishing in Bristol Bay for Almost 20 years now and it is the livelyhood of my family and me.

Proposal 44, 61-68 riss not only destroying the zockele stock of the nushugak river, our strongest, but also destroying our livelyhood.

Submitted by: Matthew Kinney

Community of Residence: Sitka, Alaska

Honorary board members, please consider leaving the plan unchanged, as a restructuring event would result in a major financial loss to the commercial fishing community, and to the communities that it supports throughout the region. Please allow status quo at least long enough to monitor the effects of the current management plan throughout a full generation of chinook salmon. Repealing the current management plan doesn't allow for a true study of its biological consequences and thus all positive headway toward research and ultimately conservation is thwarted. Thank you honorary board members for volunteering your time as I know these are not light duties to take on. We appreciate you.

Matt Kinney.

Comments on BoF Proposal 61

My name is Casey Knight and I am a 40-year-old second generation Bristol Bay drift gillnet fisherman. I have a young family. This fishery has been my primary source of income for 25 years (not counting early childhood, before I began crewing).

I **strongly oppose** Proposal 61. My reasons are as follows:

1. The proposal is poorly written. Under the section “What is the issue you would like the Board to address and why?”, the proponents of the proposal included a single two-sentence paragraph. In these two sentences, there are three typos. In addition, under the section “Did you develop your proposal in coordination with others?”, the proponents wrote ‘Not applicable’. This is clearly false. It is a Yes-or-No question; the answer to the question must be either ‘yes’ or ‘no’ — ‘not applicable’ is not an option. So which is it? Presumably, if the answer is ‘Yes’, it would be incumbent to say with whom you coordinated and what reasons for and against the proposal were considered. And if the answer is ‘No’, it seems important to give a brief explanation of why not.
2. The proponents of the proposal failed to address obvious relevant questions, such as: (i) Why do you think the current king salmon management plan is inadequate to handle your concerns? (ii) What would be the likely economic impact to various user groups, and how might they be alleviated? (iii) Have you considered other alternatives that might address your worries? (iv) Can you estimate the likely increase in king salmon escapement as a result of the adoption of your proposal? Until answers to questions such as these are *at least addressed*, the Board should not take this proposal seriously.
3. In 2023, the current king salmon management plan was adopted, after *extensive review* by stakeholders and ADF&G representatives. To change the management plan once again as the result of a *two-sentence, typo-ridden spiel* seems unwarranted.
4. As I understand it, king salmon are on a roughly 5-year cycle (feel free to correct me; but even if some kings are only 3- or 4-years-old when they return, this point still stands). Since the current management plan is only two years old, this means that there is no basis to claim that the current management plan is somehow “not working”. Consider an analogy. Suppose the coach of your basketball team, after extensive study of the opponent’s offense (and even after conferring with the players), decides that you should play a 2-3 zone against them. But then one member of the team objects in the locker room, just prior to the game, before you have even given the 2-3 zone a chance. Imagine that the objector would rather go man-to-man; he says that the 2-3 zone is “just not working”. Should the coach take the objector seriously? Clearly not.

I urge the Board not to pass this ill-conceived, hastily-written proposal. Thank you for your consideration.

Casey Knight
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Submitted by: Chris Knight

Community of Residence: Juneau, AK

Strongly support proposal 75, 76 and other similar proposals.

Purpose: These two proposals would allow for a single BB permit holder to hold two permits and continue with the current status quo of fishing two permits from a single vessel thus allowing one boat to fish 200 fathoms of gear(permit stacking).

Permit Stacking: The aim of permit stacking accomplishes two things: (1) proposals increase the net coverage by the vessel upwards of 25% of additional fishing gear. (2) permit stacking removes to date about about 35,000 fathoms (350 boats with dual permits multiplied by 100fathoms) of fishing gear from the water allowing all fishermen to catch more fish or at least have a better chance of catching more fish with a great deal of gear out of the water.

Recent board actions: You as a board recently allowed a single individual to hold two permits in Prince William Sound Gillnet fishery, which allowed individuals to stack permits to remove excess fishing gear from the water. While permit stacking currently exists in Bristol Bay, two different permit holders must be on the vessel, which has created a nefarious process of stealing by some crew members and loss of assets to families. Skippers must either find another person with a permit or trust a family asset with another person which has resulted in some cases of outright theft. Under current CFEC law, the permit holder becomes the owner regardless. In the past, the BOF has not allowed two permits in a stacking operation to be owned by one individual in Bristol Bay

Opposition to single individual permit stacking in BB has expressed concern on two fronts: one the permit values become more expensive, and two the permits are leaving the drainage. Recent permit values have been such high flux from \$65K just a few years ago to \$150K now..what we need is a stabilized value for older generation to retire out of the fishery. All too often fishermen stay in the game too long hoping to recover investemnt. Secondly, As an Alaska Resident all of my life -I deserve the same right and access to the fishery afforded to me under the Alaska Constitution as a drainage resident. There should be no difference in the rights and value to the fishery for all fishermen.

Current options for Drainage residents: Current Drainage residents have access to the AK Dept of Commerce loan program, the same loan program I used to buy my own bb permit. Additionally drainage residents have access to additional loan program with zero dollars down provided by the Bristol Bay Native Corporation. These zero interest loans and zero down programs allow anyone in the drainage to by a bb permit. Additionally the largest exodus of drainage permits holders occurred in 2007 during the fuel crisis, driving most drainage bb permit holders out to Anchorage and Washington state to find a chearper cost of living.

For the future of Bristol Bay and my residential income and family support, we need permit stacking in a single individual to stabilize the value of the permits in the fishery while removing excess gear from the water. Please after all these years, support the permits stacking as it was intended to do and as you have done for Prince William Sound.

Submitted by: Chris Knight

Community of Residence: Juneau, AK

Proposals 61 and 69

These two proposals are submitted by an entity seeking to create havoc in the commercial sockeye salmon fishery. The proposals undo existing management plans for King salmon and limit the commercial availability of sockeye salmon into the commercial market which would remove taxes and revenues from fishermen, processors and the state of Alaska as a whole.

Proposal 61 seeks to destroy the Nushagak salmon fishery by grossly over escaping the watershed potentially leading to large die offs of all future salmon species.. Bill Smoker, a fisheries biologist with NOAA fisheries documented the die off of Kvichak sockeye and other species occurring in the early 1990s caused single handedly by large over-escapement leading to excessive Nitrogen regimes in Lake Iliamna. The lake was unproductive for many years (10-15 years) due to the excess escapement.

While Proposal 61 aims to protect King Salmon its ultimate goals would ruin the river and lakes associated with the Nushagak River. Without adequate interception of sockeye, the system as a whole will become over escaped and displace important oxygen needed for egg rearing, fry development, smolt production and importantly future King Salmon, sockeye salmon production and other species. Proposition 69 is similar again restricting the commercial fishery altogether.

Neither proposal should be considered whatsoever as they are fundamentally flawed and biologically irresponsible. Please disregard proposal 61 and 69.

PC105

Submitted by: Kyle Knight

Community of Residence: Petersburg, AK

I'm a Bristol Bay commercial gillnetter and I am strongly opposed to propositions that will change the current king salmon management plan in Bristol Bay by further restricting directed commercial sockeye salmon gillnetting. The current king salmon management plan has not been given enough time to assess its efficacy. Passing further restrictions that specifically target the commercial sector does not share the burden of conservation & could have the effect of excessively restricting sockeye salmon harvest opportunity in a fashion inconsistent with the Alaska State Constitutions "maximum sustainable yield" mandate. It could cost the commercial sector & canneries millions of dollars & the Dillingham borough considerable money in raw fish tax.

Please do not pass more unfair & punitive regulation changes that favor the sport & charter industry at the expense of the commercial sector.

PC106

Submitted by: Will Koger

Community of Residence: Washington state

I'm a Bristol bay drift permit holder and I have held a permit for the last 25 years and I have fished in Bristol Bay for the last 34 years. I strongly oppose 61-68! I would like ADFG to keep running it as it has been in the past.

PC107

Submitted by: Peter Konovalov
Community of Residence: Homer

If we get shut down til the 28th the sports fisherman should be shut down too to support King Salmon escapement

PC108

Submitted by: Fiona Kroontje
Community of Residence: Richland Washington

Proposals 61 and 62 puts undo burdens on commercial fleet - this should be addressed in other ways

PC109

Submitted by: John Kroontje
Community of Residence: Lynden

Please do not add more conservation efforts burdening the commercial fleet.

PC110

Submitted by: Kara Kroontje
Community of Residence: King Salmon, AK

Proposal 61 and 62 - do not force more conservation efforts on the commercial fleet. They have already significantly reduced their share of king harvest

PC111

Submitted by: Lesa Kroontje
Community of Residence: Lynden WA

Proposal 61 and 62. Do not force additional conservative efforts on the commercial fleet. The contribution of this fishery should be recognized and should not bear the burden of additional regulatory measures.

PC112

Submitted by: Thijs Kroontje
Community of Residence: Lynden, Washington

Proposal 61 & 62 do not add more conservation efforts on the drift boat fleet

Submitted by: Viola Kroontje

Community of Residence: Lynden, WA

proposal 61 & 62

don't further burden the commercial fleet with more conservation efforts forced upon them.

Submitted by: William Kroontje

Community of Residence: King Salmon

My name is William Kroontje, resident of King Salmon, Alaska. I am a current SO3T permit holder, vessel owner, and fishery conservationist. I have been actively participating in both set and drift net commercial fishing in Bristol Bay since 2007.

Proposal 57

I strongly oppose this proposal.

There are currently very specific regulations that outline requirements for how drift and set net gear must be managed. Creating new boundary lines which include set net, but exclude drift boats, in certain areas of water, is ridiculous. It is not uncommon for areas of beach to be free of set nets. Currently, drift boats are able to access these areas and operate their gear in a legal manner, that includes maintaining specific distances from set nets.

The highest concentration of sockeye salmon is often tight to the shore line. Reserving and restricting areas such as these for setnet gear only, is in no way fair or equitable to the drift fleet. Please disregard this proposal, as it aims to greatly benefit a small and specific user group at the expense of the large majority of the fleet.

Proposal 61 and 62:

I strongly oppose both of these proposals. These proposals both aim to increase the burden of king salmon conservation upon the commercial gill net fleet. The commercial fishing fleet has already drastically reduced their historical share of the king salmon harvest, and forgone any commercial king openers for a generation. While commercial gillnet users have been making significant sacrifice, the sport fishing user group has increased their share of harvest.

Historically, from 1966- 2022, commercial gillnet has maintained an 80.3% share of nushagak king salmon harvest. In this same time period, sport fishermen have maintained an average of 5.5% of the harvest. In the spirit of conservation, commercial fishermen have recently reduced their king harvest share to 1/10th its historical average (2022), while sport fishermen have increased their historical catch by approximately 50%.

Recent king salmon conservation efforts made by the commercial fleet have had enormous biologic and financial impacts on the sockeye fishery. The impact of these new conservation efforts are largely unknown at this time. Doubling down on these efforts via these proposals, would result in potentially catastrophic results for the sockeye fishery.

It is not sensible for commercial fishermen to be depressed further by extreme conservation efforts, while sport fishermen are actively targeting and harvesting the very fish the commercial fleet has sacrificed to save. The commercial fleet has currently gone to the furthest extent reasonably possible to prevent the unintentional catch of king salmon

If further conservation efforts need to be made for nushagak king salmon, adding burden to the commercial gill net fleet should not be a consideration at this time. The commercial fleet has long since halted intentional harvest entirely; it's only fair that the sport industry follow suit as the next step in conservation.

Data stated above was derived from the source cited at the end of Proposal 62

"(as cited in Table 1 of the "Nushagak River King Salmon – Stock Status and Action Plan" Nov 29, 2022)"

Proposal 70, 71, 72

I strongly oppose these proposals and others that pertain to the implementation of a general district.

Removing district boundary lines late in the season will have unintended effects. There will be an increase in fishing participation late in the season. The increased participation and larger fishing area will result in more fish being caught. Of the increase in catch, some fish may be genetically important to particular stocks or spawning streams. Increasing the catch of these fish could have very negative impacts on the health and viability of certain ecosystems.

It is common for fishermen to assume that every fish above and beyond the escapement goal is surplus available for harvest. I do not believe this to be the case. The current regulations and boundary lines, although frustrating at times, have proved to allow for sustainable sockeye returns and profitable commercial harvest.

Proposal 76

I strongly support this proposal

Allowing the stacking of drift permits will help facilitate natural reduction and or growth of fleet size based on the current economics of the fishery. Fleet reduction will also aid in conservation efforts for stocks of concern, such as king salmon.

Currently, the average fisherman in Bristol Bay struggles to maintain sustainable profit levels. Many watershed residents are unable to participate, as it is not financially sensible. Potential local fishery participants are forced to forgo fishing opportunities in favor of other year round job commitments to make ends meet. Measures that facilitate fleet reduction will increase profitability, allowing more state and local residents to pursue fishing opportunities as viable options.

PC115

Submitted by: Kurt Kvernvik

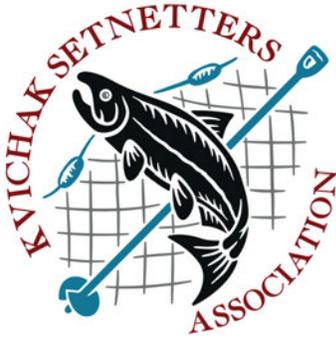
Community of Residence: Petersburg Alaska

I strongly oppose proposal # 44 and proposals 61-68

We have a management plan in place that addresses the King Salmon declines in population and minimizes the fleets impacts on the King Salmon Stock. Implementing any of these proposals , would significantly harm the Sockeye salmon fishery, the Fisherman, the processors and the communities that depend on the Nushagak Sockeye harvest.

I strongly support proposal 78

Proposal 78 addresses the fact that recent studies have shown. That there are too many boats chasing too few salmon for too low of a value. Many boats are struggling to attract crew, as the average shares do little to compete with safer onshore employment. Allowing a single boat owner to own and operate 2 permits will further reduce congestion in the fishery, thus supplying higher wages for the average crew and making management less complicated for all the Rivers in Bristol Bay.



Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811

December 29, 2025

Subject: BOF Record Comments - **Kvichak Setnetters Association**

Dear Members of the Alaska Board of Fisheries,

The Kvichak Setnetters Association (KSA) represents set gillnet permit holders in the Kvichak Section of the Naknek-Kvichak District. With 82 active, dues-paying members, we form a significant and experienced segment of Bristol Bay's historic fixed-gear fishery. Our mission is to present a unified voice for our members, especially at Board of Fisheries meetings. We work to ensure that set net fishers in the Kvichak section are given fair access to sockeye bound for the Kvichak River.

Located at the eastern end of the bay, our section faces unique challenges that require targeted regulations to ensure equitable access and sustainable yields.

Our positions on specific proposals are summarized in the following table. We respectfully urge you to give consideration to the informed perspective of KSA members.

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
45,46,47	SUPPORT	<p>District Registration and Reregistration End Date (July 17 → July 22)</p> <p>Extending the district registration and reregistration deadline to July 22 provides managers with additional flexibility during a critical portion of the season when run strength, timing, and in-season performance become clearer. This change supports more accurate escapement management while helping maintain reasonable balance between gear groups. Given the late-season dynamics of the Kvichak section and its position at the terminus of Bristol Bay, additional registration flexibility improves management precision without expanding overall fishing effort.</p>
48	SUPPORT	<p>KRSA Fixed 2:1 Drift/Set Ratio</p> <p>KSA supports modifying the Kvichak River Special Harvest Area (KRSA) to a fixed 2:1 drift-to-set opening ratio. The current 3:1 ratio in both the KRSA and the Naknek River Special Harvest area (which the KRSA was modeled after) is outdated and unfair to setnetters. The drift fleet is highly mobile and able to change districts mid season if a particular district is falling short of escapement, but the number of setnetters fishing in that district does not change as setnetters are generally married to their area, with shore based operations they can not travel far from. It makes very little sense that setnetters must sit out 3 out of 4 openers while drifters get 3x the fishing time no matter how low the participation is of the drift fleet during a KRSHA opener. A 2:1 ratio is a more equitable distribution between groups and should apply to both the Naknek and Kvichak special harvest districts.</p>
49	SUPPORT	<p>Dynamic KRSHA Drift/Set Ratio</p> <p>KSA supports the concept of a dynamic drift-to-set ratio. If a dynamic approach proves overly complex or difficult to administer in real time, KSA strongly prefers reverting to the fixed 2:1 ratio described in Proposal 48 for simplicity.</p>
50	SUPPORT	<p>Incorporating Fish Quality into Management Decisions</p> <p>KSA strongly supports incorporating fish quality considerations into Bristol Bay commercial salmon management. Harvest quality directly affects ex-vessel value, market reputation, and long-term economic sustainability for fishing families and communities. Managing for high product quality—while minimizing waste—is consistent with maximizing the value of the resource and aligns with modern market realities. Quality is no longer a secondary consideration; it is integral to the economic health of the fishery.</p>

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
51	SUPPORT	<p>Additional Drift Gear Carried in KRSHA (Brailer Bag Requirement)</p> <p>KSA supports allowing additional drift gillnet gear to be carried onboard in the Kvichak River Special Harvest Area, provided that total onboard gear limits are maintained and additional nets are stowed in a brailer bag. This proposal maximizes quality while minimizing the inconvenience of having to remove gear off the vessel prior to participating in the KRSHA.</p>
52,53	NEUTRAL	<p>Egegik Special Harvest District</p> <p>KSA takes no formal position on Proposals 52 and 53 related to the Egegik Special Harvest District.</p>
61	OPPOSE	<p>Nushagak District King Salmon Triggered Sockeye Closures</p> <p>KSA opposes Proposal 61, which would impose daily commercial sockeye closures in the Nushagak District based on king salmon projections. This proposal relies on uncertain in-season projections and does not adequately demonstrate that the proposed closures would meaningfully improve king salmon outcomes. More importantly, restricting fishing opportunity in one district predictably displaces effort into neighboring districts, including the Naknek/Kvichak District, increasing congestion and management pressure without addressing underlying stock-specific issues.</p> <p>Proposal 61 limits district Biologists' ability to manage sockeye escapement, most likely leading to overescapement of sockeye salmon. This could negatively affect all salmon species.</p>
62	OPPOSE	<p>Delayed Nushagak Commercial Fishing Until June 28 or King Escapement Threshold</p> <p>KSA opposes Proposal 62 for similar reasons. Broad early-season closures in the Nushagak District risk shifting fishing effort into adjacent districts rather than achieving conservation objectives. Without clear evidence that this approach materially improves king salmon returns, the proposal represents a reduction in commercial opportunity with significant cross-district consequences and uncertain biological benefit.</p>
70	OPPOSE	<p>Expansion of Ugashik District by 40%</p> <p>KSA strongly opposes expanding the Ugashik District by 40%. This proposal would increase interception of Kvichak-bound stocks, directly undermining access for Kvichak setnet permit holders. District boundary expansions that increase mixed-stock interception should</p>

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
		be avoided unless supported by clear biological justification and allocation analysis, neither of which is demonstrated here.
71-74	OPPOSE	<p>Reestablish General District</p> <p>The creation of a general district contradicts the ADF&G biologist's priority of managing each district as a terminal fishery and establishes an intercept fishery. Daily harvest numbers for each district are essential for biologists to manage run size and allocation, and a district in the middle of the bay would be impossible for management to assess what river those fish were bound for. This proposal would increase interception of Kvichak-bound stocks, directly undermining access for Kvichak setnet permit holders.</p>
75-78	Neutral	<p>Drift Permit Stacking</p> <p>KSA is neutral on drift permit stacking. However, if permit stacking is authorized for drift fisheries, parity considerations suggest that stacking opportunities should also be evaluated for setnet permit holders to maintain equitable access across gear groups.</p>
80	SUPPORT	<p>Joint Ventures for Setnet Permit Holders</p> <p>KSA supports allowing joint ventures for up to two setnet permit holders. Limited-scale joint ventures can improve safety, efficiency, and economic viability without materially increasing fishing power. Any expansion beyond small-scale ventures should be approached cautiously and evaluated by the Board rather than assumed through statute alone.</p>
81	NEUTRAL	<p>Use of Alternative Gear in Bristol Bay</p> <p>KSA is neutral on the use of alternative gear. While innovation and experimentation may have merit, any alternative gear proposals should be tested on a limited scale with careful consideration of site-specific impacts. Given the fixed nature of setnet sites, even small-footprint gear could have disproportionate effects on neighboring operations if not carefully evaluated.</p>
92	OPPOSE	<p>Closing Naknek/Kvichak District After July 25</p> <p>We strongly oppose closing the Nak/Kvi district after July 25. As it becomes late July many vessels have been put up and setnetters gone home – it completely takes away the opportunity for the harvest of surplus sockeye, particularly for locals who are better set up for fishing late run salmon. The “historical data” referenced is outdated. Salmon run times have been occurring later in recent years and the</p>

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
		large processors have been processing sockeye later than the historical norm. We would need more current data before risking a large economic impact.
105	OPPOSE	<p>Creation of New Bristol Bay King Salmon Management Plans</p> <p>KSA opposes creating new king salmon management plans in rivers that do not currently have them unless adequate data can be collected and clear biological goals can be crafted from adequate historical data.</p>

Thank you for your consideration and public service. Several of our members will be available for further testimony during the meeting.

Sincerely,

The Kvichak Setnetters Association Board
Kvichaksetnetters@gmail.com

Corey Arnold - President
Aaron Schrier - Vice President
Eric Meyer - Treasurer
Tiel Smith
John Schandelmeier
Joe Echo-Hawk

Lake and Peninsula Borough Comments

Re: Permit stacking in the Bristol Bay drift fishery

The Lake and Peninsula Borough (LPB) appreciates the opportunity to comment on proposals submitted for the Board of Fisheries Bristol Bay Finfish Meeting.

Our Borough encompasses 17 communities today spanning three distinct and diverse fishing regions of southwestern Alaska: the Lake Iliamna Area, which includes the Kvichak River, the Upper Area of the Alaska Peninsula, and the Chignik Area on the Pacific side of the Alaska Peninsula. These communities are home to Central Yup'ik, Unangax, Alutiiq, and Dena'ina Peoples with a recorded history of 9,000+ years of hunting and fishing. In the last 150+ years, Lake and Pen Borough communities and residents have come to engage and rely heavily on commercial fishing opportunities and seafood industry-related income.

LPB submits these comments on proposals pertaining to the potential introduction of permit stacking in Bristol Bay salmon fisheries. Specifically, Proposals 75-78 propose allowing for some variation of permit stacking in the Bristol Bay salmon drift fishery.

LPB strongly opposes plans to introduce permit stacking in Bristol Bay salmon fisheries and considers permit stacking to be a major restructuring of the fishery that will dramatically change how (and by whom) fish are harvested. In the past we have seen how these kinds of measures disproportionately harm local participation in fisheries.

Gho (2020) documents how the dual permit regulation change adopted by the Board of Fisheries in 2004 has negatively impacted local and Alaskan permit ownership in the Bristol Bay salmon drift fishery. Although the motivation behind this regulation was to reduce the transfer of permits to nonresidents and encourage new entrants from Alaskan communities local to the fisheries, it has instead had the opposite effect and shifted access across residency categories, primarily benefiting nonresidents.¹ Gho (2020:21) describes how the dual permit program has attracted new entrants as intended, however, since allowing dual permit operations in 2004, nonresidents account for 58% of new entrants into the drift fishery. The share of drift permits owned by Alaska residents declined from 63% to 45% in this time frame (ibid). It would be helpful to this issue as well as a matter of regular reporting to systematically publish the rate of new entrants by residency category. This would clearly show what the overall rate of new entrants masks; a large difference between local, nonlocal, and nonresident new entrants.

Similar impacts have been documented in the Bristol Bay setnet fishery following passage of HB 286 (2002) and HB 251 (2006) in the Alaska State Legislature. HB 286 allows a person

¹ Gho, M. 2020. Bristol Bay Dual Permit Operations, Vessel Heterogeneity, and the Migration of Alaskan Permit Holders. Dissertation. University of Alaska Fairbanks. Fairbanks, AK, August 2020.

to hold two permits, although only one permit can be fished. The intent of this statute was to allow Alaskans to retain permits until they could be transferred to other Alaskans rather than sold to nonresidents. The passage of HB 251 allowed the BOF to grant a person who holds two permits additional fishing opportunity. Notably, when a similar regulation change was proposed in the 1990s, it was presented primarily as a fleet reduction tool, and not an appropriate permit retention tool. In fact, one of the identified drawbacks to the proposed regulation was increased demand for permits resulting in “some individual Alaskans most dependent upon their local fisheries sell[ing] their entry permits” (CFEC 1998:24).² The BOF authorized permit stacking in the Bristol Bay setnet fishery in 2010 (CFEC 2012).³ Although the regulation sunset in 2012, available data shows that permit stacking reallocates harvests across residency classes in Bristol Bay fisheries (CFEC 2012:13). Permit stacking also reduced opportunity for new entrants into the setnet fishery (ibid.).

LPB is concerned with the immediate and cascading effects of allowing for permit stacking in Bristol Bay fisheries, especially further erosion of local permit holdings and reduced new entrant opportunity overall.

Further, it is unclear how permit stacking will lead to improved conservation and management outcomes of the fishery, especially with regard to managing fisheries for the maximum benefit of Alaskans. Clearly established guidance and criteria is needed to evaluate the need, goals, and desired outcomes for restructuring of a fishery via permit stacking.

The stakes are high when it comes to restructuring a fishery, and they are especially high for local participants who often earn significantly less from fishing than nonlocal participants but are much more dependent on the fishery for their cash incomes (see CFEC 2018, 2025, Knapp 2014).⁴ The commercial salmon fishery represents the primary private source of cash employment in the Bristol Bay region, even while local residents have the lowest average earnings per permit fished (see for example Knapp 2014:121; CFEC 2025).⁵

LPB opposes permit stacking in Bristol Bay fisheries and thanks the Board of Fisheries for their time and careful analysis of such proposals.

² Commercial Fisheries Entry Commission (CFEC). 1998. Outline of Options for Fleet Consolidation in Alaska Salmon Fisheries. CFEC report. December 1998.

³ Commercial Fisheries Entry Commission. 2012. Bristol Bay Set Gillnet Permit Stacking. CFEC Report 605. no. 12-02-N November 2012.

⁴ Commercial Fisheries Entry Commission. 2018. CFEC Permit Holdings and Estimates of Gross Earnings in the Bristol Bay Commercial Salmon Fisheries, 1975-2017, CFEC Report 18-7N.

Knapp, G. 2014. Bristol Bay Wild Salmon Ecosystem: Baseline Levels of Economic Activity and Values in Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, AK. Volume 3 Appendix E, Available at https://www.epa.gov/sites/production/files/2015-05/documents/bristol_bay_assessment_final_2014_vol3.pdf

⁵ Commercial Fisheries Entry Commission. 2025. CFEC Permit Holdings and Estimates of Gross Earnings in the Bristol Bay Commercial Salmon Fisheries, 1975-2024, CFEC Report 25-07N.

Submitted by: Donald Lawhead

Community of Residence: Wasilla Alaska

Dear Members of Alaska Board of Fisheries

My name is Donald Lawhead , I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals

I oppose Proposals 44 and 61-68 to the extent they would modify the Nushagak King Salmon Stock of Concern Management Plan.

The SOC was developed through a multi-year stockholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and needs more time to see how it is working. The plan is working as intended delaying commercial openings, reducing fishing time to allow Chinook escapement. The large sockeye salmon runs have returned early and ADFG has the ability to target them while allowing Chinook escapements.

This last summer over 7 million sockeye salmon returned before June 28th.

Some summers that is the entire run of sockeye.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a longer period of time.

I oppose Proposals 44-47 and no need to change the dates.

I oppose Proposal 92 no need to close to fishing.

Sincerely

Donald Lawhead

F/V Diondra Jean

Submitted by: Dominic Lee

Community of Residence: Utah (I am a Commercial Bristol Bay Drift fisherman)

Prop 45: It is true that this district has a later run timing and for those who fish only in this district can be negatively affected by the influx of vessels who've already put a season in another district and come here with a free transfer. I'm neutral to slightly in favor.

Prop 46:It is true that this district has a later run timing and for those who fish only in this district can be negatively affected by the influx of vessels who've already put a season in another district and come here with a free transfer. I'm neutral to slightly in favor.

Prop 51:This proposal makes sense. Having to drop gear off to a tender to fish a special harvest area is a complicated mess. Bagging it and holding it aboard is more reasonable. I support this proposal.

Prop 52: This proposal sets out to solve a problem I didn't know existed. I don't see a problem with giving the biologist more tools to maximize harvest when escapement is strong.

Prop 56: With sealevel change, this proposal while trying to establish clarity may have unintended consequences, potentially allowing setnets to operation well away from shore. I think this needs to be further discussed before I can support this. Not in support.

Prop 57: I do not support this. This esstually makes a setnet exclusive area regardless of setnets being in the water or not. This area is a concentrator and setnetters are trying to make this a setnet only area. I do not support this proposal.

Prop 59: I'm neutral on this one. The wood river special harvest area is a tool that allows for additional harvest when the Nush is behind. It also allows for allocation adjustment. I don't mind letting setnetters to catch up using this tool.

Prop 61: We need to develop an accurate way to count King Salmon first before we make any more regulation that rely on scanty information. I do not support this proposal.

Prop 62: We need to develop an accurate way to count King Salmon first before we make any more regulation that relies on scanty information. I do not support this proposal.

Prop 63: This is a step in the right direction. More accurate data is needed to properly manage kings in this system. I support this proposal.

Prop 64: I agree with the logic of this proposal.

Prop 65: I do not support this proposal.

Prop 66: Again, we need accurate counting first. I do not support this proposal.

Prop 67: Again, we need accurate counting first. I do not support this proposal.

Prop 68: Again, we need accurate counting first. I do not support this proposal.

Prop 69: Again, we need accurate counting first. I do not support this proposal.

Prop 71: I strongly support this. Late season once all rivers have met escapement goals there is no need for boundaries that confine fishermen to districts and incentives fishermen to fish illegally. There is no reason to continue to restrict fishermen to these small areas. It creates conflict and encourages illegal fishing. By adopting a general district like this also eliminates the need to enforce those boundaries. This is way past due.

Prop 72: This is another good approach to the general district as proposed in #72. I support a general district.

prop 73: This proposal has good intent. I think the prior two proposal have better language and address the same issue.

Prop 74: I support this proposal.

Prop 75: Permit stacking has many benefits. I strongly support this.

Prop 76: I support this proposal.

Prop 82 to 91: I agree with the intent of these proposal. I think we should just remove the length limit. I believe the number one issue to get the most economic value out of the resource is to have the highest quality product. Currently the 32 ft vessels are not set up to handle let alone refrigerate all the fish they

catch in a day. If we are going to give the customer what they want we need to improve handling at the point of harvest. We need to treat fish like the troll fishery does in SE Alaska. To do that at scale we need bigger hold capacity and capacity to hold more crew to process fish on board at scale as they come aboard.

Prop 92: I don't support this proposal.

Prop 95: I'd rather see a non-registration required general district for free-week.

PC120

Submitted by: Jon LeVan

Community of Residence: Seward, Alaska

Jon LeVan FV K2

Alaska resident 28 years (from birth)

Fishing Bristol Bay 12 years 4 as an owner/captain

44, 61-69 No changes to King salmon plan till we see what a full cycle does. Commercial fisherman already are taking the a loss to a problem that they are not the leading factor or cause of but we would like to save Kings also I think the plan is working to the extent it can.

52, Strongly approve I fish Egegik and talked to Luke who proposed this idea for over an hour and strongly with his reasoning both historical and looking forward. Please adopt this proposal.

53 Strongly oppose, does not solve anything and only adds more problems.

70 Any drifter can drop there card in any district we can't change boundary lines just because some fisherman love there district so much and don't want to fish anywhere else.

72 Strongly approve some form of a general district for late season fishing it is the best solution to deal with many late season problems.

77 Support but I don't support permits being bought back as the new E permits would be worth more. I like the idea of allowing one fisherman to legally own and fish two permits, but I do have to say it really made it possible for me to enter the fishery by being a 'D' permit holder and then buying a boat to fish my own permit. However any stacking law would prohibit this but if permits shot up in value it would be hard to enter the fishery. I like this proposal because it has a cap of E permits 300 to help us get to a better # of vessels fishing and also allow people to be legal owning 2 permits. I think we should adopt this proposal but not buy back permits.

PC121

Submitted by: Crosby LeVein

Community of Residence: Cordova Alaska

I oppose 44 and 61 through 66

Submitted by: Joshua Lewis

Community of Residence: Anchorage, ALASKA

I am a commercial salmon drift fisherman that has fished in the Nushagak for the past thirty-five years. I am writing to oppose Proposals 44, 61-68. I am asking the Board of Fisheries to leave the plan unchanged. The current plan has not been given adequate time to demonstrate its effectiveness. Closing the fishery until the 28th of June will result in massive overstatement of sockeye salmon in both the Nushagak and Wood rivers.

Thank you for your consideration.

Joshua Lewis

Anchorage, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is **Cameron Libby**, and I am a Set-Net Permit Holder fishing on Ekuk Beach in the Nushagak District of Bristol Bay. I have been actively fishing on Ekuk beach since I was born. My dad started fishing on Ekuk beach when he was 10 (1959) and my grandparents had been active in the Dillingham and Bristol Bay region for over 50 years with commercial fishing a big part of their lives. Commercial fishing has been an important part of our lives for 3 generations and we are in the process of passing it onto the 4th generation.

I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,



Cameron Libby

████████████████████

████████████████

Ekuk Beach, Nushagak District

Submitted by: Stephen Libby
EBFA

Community of Residence: Anchorage , Ak. / . Dillingham, Ak

As indicated above, I'm a lifelong resident of Dillingham with hands- on experience since 1959. I've had both drift participation as well as set net participation over the years. Currently my family continues to fish on Ekuk beach with my grandkids having the site leases and permits. An exciting legacy/ participation it's been for me to be a multigenerational participant!!

I support a full cycle Nushagak Management Plan as the best solution to arriving at the proper strategy for long term sustainability of all species. Abandoning this mud stream seems unwise to me!

I support Proposal 56! Adopted in 2022 by Board it's been working successfully. Suggest leaving this alone!

I support Proposal 57! This reduces entanglement risk, gear loss and unsafe near shore interactions by being definitive about spatial limits and gear definitions. Drift fleet has grown significantly in size and horsepower which requires clear rules of interaction.

I support Proposal 80! Joint ventures help small, family based adapt to short openings, rising costs, and safety challenges. For reference this has worked in Kodiak set- net fisheries for 40 plus years successfully!

Economic and Community Impacts of Missed Allocation!!

In recent years set-net fishermen in the Nush District have consistently fallen far short of Board adopted 26% set-net allocation! These shortfalls have heavily impacted fishing families, local processing, and watershed communities such as Ekuk. Keep in mind these missed numbers adversely affect LOCAL families as Ekuk is multigenerational in nature. Let's adhere to the allocations guidelines!!

Thank you for your service to fisheries and communities!

Respectfully submitted. Steve Libby

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Warren Libby, and I am a set-net permit holder of over 20 years fishing on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area. Referencing changing geological markers (distance from beach, etc.) will become more problematic as erosion increases from rising sea levels and storms.

Support for Proposal 57: Orderly and Safe Fishing

I strongly support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery. We have damage to our gear on a regular basis due to irresponsible drift operators. It's as if someone has free access to use your personal property for their financial gain without any accountability for damage. There is no reason for drift operators to literally fish on our gear. Damage to our gear takes time, work, and money to repair and is tide dependent, meaning lost fishing time. There have also been boats that operate while tides ebb that end up inadvertently going dry right in the middle of our setnet operation. This obviously hampers our ability to operate. If boats are not allowed access shoreward of our gear, most of these issues would disappear.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades. My

brother and I are 3rd generation set-netters. Our children are learning the operation. The magic of fishing for us is working together all season.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,
Warren Libby

Ekuk Beach, Nushagak District

PC126

Submitted by: Charles Lindsay

Community of Residence: Homer, AK

I oppose Proposals #44, 61, 62, 63, 64, 65, 66, 68, and 69 because similar management strategies in other areas (such as Area H) have failed to protect stocks of concern, while severely limiting commercial harvest and contributing to over-escapement. These approaches have not produced the intended conservation outcomes and have created unnecessary harm to fishermen.

I oppose Proposals #75, 76, 77, 78, and 80 because making it easier to stack permits disproportionately benefits wealthier permit holders, allowing consolidation at the expense of local fishermen and working families who depend on this fishery.

I oppose Proposals #82, 83, 84, 85, and 87 because we do not need to further incentivize bigger, longer boats in this fishery. These changes would increase costs, intensify effort, and further disadvantage smaller, local operators without clear conservation benefits.

PC127

Submitted by: Hayden Linscheid

Community of Residence: Kodiak Island, Alma Colorado

The proposal I'd like to address the most is 61. It is unreasonable to ask the commercial fleet to sit down even more for kings. We have cut our king fishery out completely from 25 years ago. We sit down to let kings go up just for sport fisherman to use barbed hooks and catch and release until they catch the fish they desire. I'd like to see the sport fisherman step up and make some sacrifices. The sport fisherman harvested more kings than the whole commercial fleet in 2025.

I support stacking permits as in proposal 78. It's time to make the change as the fishery and boats fishing have changed. Allow permit stacking.

PC128

Submitted by: Aiden Long

Community of Residence: Palmer

I am opposed to proposals 44, and 61-68. I am specifically against hurting the commercial fishing industry when there is no sound proof against gillnetters majorly hurting king number in the Nushagak. I am an Alaska resident of 19 that has grown up sport fishing and commercial fishing. While gillnetters do have some bycatch, it's frustrating to hear sport fishermen talk about how we slaughter "there" kings. There is an ignorant in the sport/guide fishing community that does not understand how little we affected the kings. I am excited about the future of Bristol bay and see potential for young guys like me to make a living as residents. It is simply frustrating when the sport fishing community has the ability to hurt such a good opportunity when, like I said before, they are simply ignorant. Many things have affected the decline of kings in the last couple decades, change in spawning ground, water temperature, food, over and under escapement of all salmon species, invasive species, sport fishing, beavers, trawlers etc. I fished a number of high producing boat the last couple years in Bristol Bay fishing the Nush, and have seen a lot more king salmon killed by poaching on rod and reel behind my house. We call the

troopers and they never show up. The only time we can actually control what happens to our salmon is when they finally return to their spawning grounds and the state has not done a good job controlling it. In my perspective slowly shutting down the commercial gillnetters like this is a passive answer to what actually happens.

PC129

Submitted by: Douglas Long

Community of Residence: Palmer

I oppose proposal 61

Not allowing commercial fishing of sockeye salmon until June 28th, and only allowing 12 hours of fishing a day till July 4th, would cause over escapement of sockeye salmon, effecting the runs in a negative way in the future.

Approximately 7 million sockeye (35 million dollars at \$1.00 a pound) that would typically be harvested in the Nushagak, would be allowed to escape, which would be a huge loss that will affect all the commercial fisherman across Bristol Bay. Normally 600 (almost half) of the drift vessels in Bristol Bay, begin their season in the Nushagak and most of them would be forced to start in other districts.

The current Chinook management plan, though it is not desirable to the commercial fishing industry, has necessary sockeye over escapement triggers in the Wood and Nushagak rivers, to keep a sustainable sockeye run, and to keep the harvestable sockeye available to the fishermen.

PC130

Submitted by: Jeffrey Ludwig

Community of Residence: Bristol Bay Drift Fisherman residing in Washington State

Greetings Board Members. My name is Jeffrey Ludwig, and I am a Bristol Bay driftnet permit holder with 19 years of experience (8 as a crewmember, 11 as a vessel owner/operator).

I oppose Proposals 44 and 61–69 and urge the Board of Fisheries to leave the Nushagak District King Salmon Stock of Concern (SOC) Management Plan unchanged. The plan was adopted in 2023 following an extensive, science-based and stakeholder-driven process and has not been in place long enough to evaluate its effectiveness across a full Chinook salmon generation or the full range of run conditions. Prematurely restructuring the plan would reset the evaluation process, undermine stakeholder confidence, and reduce management flexibility before meaningful conclusions can be reached.

Available performance assessments indicate the current plan is functioning as intended by delaying openings, increasing king salmon passage, expanding in-season closures, and significantly reducing commercial fishing time. These are substantial conservation measures already in place. In addition, there remain legitimate concerns and uncertainty regarding the accuracy and precision of king salmon enumeration in the Nushagak. Making further structural changes based on limited time-series data and imperfect enumeration increases the risk of management error.

Proposals 44 and 61–69 would further restrict commercial fishing opportunity without clear biological justification and could result in significant losses of sockeye salmon harvest. From a biological standpoint, unnecessary restrictions increase the risk of sockeye overescapement, which can negatively affect future productivity and stock health. From an economic standpoint, these proposals threaten the

livelihoods of Bristol Bay permit holders, crew, processors, and the communities that depend on a stable and sustainable commercial fishery. The Board should allow the existing SOC Management Plan to remain in place long enough for a full, data-driven evaluation and oppose Proposals 44 and 61–69.

PC131

Submitted by: Joel Ludwig

Community of Residence: Arlington

Written Public Comment on Proposal #76

Permit Stacking

Submitted to the Alaska Board of Fisheries

Bristol Bay Finfish Meeting

Name: Joel A. Ludwig, S03T Permitholder and vessel operator (45 years in Bristol Bay fishery)

Date: 22 December 2025

I am writing to offer perspective on Proposal #76 regarding permit stacking. This proposal improves the existing dual permit system in several important ways, outlined below.

The current dual permit system serves to reduce the amount of gillnet gear deployed in the Bristol Bay salmon fishery. The nine-year average of dual permit operations is 371 vessels, which equates to 37,100 fathoms of gear removed from the water (100 fathoms multiplied by 371 equals 37,100 fathoms, or approximately 42.16 miles). This information is drawn from annual Alaska Department of Fish and Game (ADF&G) reports. This reduction benefits fishermen in several ways.

First, it provides flexibility for fleet size to expand or contract in response to market and fishery conditions. Additionally, it offers a means to achieve the optimal number of drift vessels—between 900 and 1,400, as identified by the Commercial Fisheries Entry Commission (CFEC)—without implementing a buyback program.

Second, permit stacking, in which a single operator fishes two permits using 200 fathoms of gear, provides stability and financial security for fishermen making long-term investments in dual permit operations.

Third, reduced gear and vessel numbers may help improve ex-vessel prices, as processors must compete to secure deliveries from a smaller fleet.

Fourth, there is potential for increased fishing opportunity due to reduced overall gear and fleet congestion.

Finally, a less congested fishery can also lead to improved fish quality standards.

Additionally, the Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan, prepared by the Bristol Bay Science & Research Institute, identifies “fishing effort (number of permits, boats, sites)” as one of several factors affecting king salmon conservation. Vessels operating under a dual permit system can play a meaningful role in reducing the total amount of gear available to harvest king salmon.

I would also like to address potential opposition to Proposal #76. One concern may be that permit values could increase if the proposal passes, potentially limiting entry opportunities for new participants.

However, Bristol Bay permit values have historically fluctuated widely, ranging from highs of approximately \$275,000 (prior to the implementation of the dual permit system) to lows of around \$17,000. Permit values will continue to fluctuate based on both biological and economic conditions within the fishery.

Moreover, there are multiple avenues of financial assistance available to prospective entrants, including the Bristol Bay Economic Development Corporation's Permit Loan Program, Alaska State loan programs, NOAA/NMFS programs, processor financing aimed at securing future fleet participants, and conventional commercial lenders.

Finally, the CFEC 2024 Annual Report notes that the aging of the fleet has resulted in the average age of participants increasing from 46.4 years to 53 years. This trend suggests that, in the coming years, additional permits are likely to become available as current participants retire or otherwise exit the fishery, potentially increasing opportunities for new entrants.

Respectfully submitted,

Joel A. Ludwig

PC131

Submitted by: Joel Ludwig

Community of Residence: Arlington Wa

Approve proposals 71-74

The positive effects of these proposals are as follows;

Eliminates illegal fishing

Creates more opportunity for fleet

Creates more opportunity for Local Watershed Fleet

Provides more resource to Large, Medium, & Small Processors

Improves Quality of Harvest

Spreads out fleet, which might help with Marine Mammal Damage

Generates more State & Local Taxes

PC131

Submitted by: Joel Ludwig

Community of Residence: Arlington

Approve proposal 83

Approve for the following reasons;

Safety (Vessel with Slack tanks is very dangerous)

Quality of Product (With new technology of refrigeration, bigger vessels will be needed)

Older vessels could get new life and increase Quality & Production

By approving this proposal' vessels will be safer, more efficient and will increase the value of the resource. which is in everybody's interest.

PC132

Submitted by: Steven Ludwig

Community of Residence: Silvana, Wa.

I'm in opposition to proposals 44, 61-69. I would urge the Board of Fisheries to leave the Nushagak king salmon management plan as is. The current plan was implemented in 2023 and in that time frame it would be to soon to come to conclusion on the effectiveness of it. We are fortunate to have one of the largest sockeye salmon runs in the world and hopefully we can continue to harvest and maintain the fishery to the fullest extent allowable without jeopardizing the current status.

PC133

Submitted by: Stephen Maher

Community of Residence: Asheville, NC

I am commenting on proposals 44, 55, 57, 61-69, 71-74, 75-78, 81, 82-91

I am opposed to any changes in the king salmon stock of concern management plan right now. The current plan has not been in place long enough to determine its effectiveness. I am opposed to sport fishermen tweaking a plan for their own benefit, and not the resource.

I am opposed to opening up the East Side General District late season. I think it would be unsafe.

I am opposed to allowing single owner permit stacking. I like the parity individual owners bring to the fishery.

I am opposed to set net fishermen at Ekuk having any kind of exclusion zone. It would not be fair or in the spirit of this fishery.

PC134

Submitted by: Casey Marinkovich

Community of Residence: Washington State

To the Alaska Board of Fish,

My name is Casey Marinkovich and I have been commercial fishing in the state of Alaska since I was ten years old and have fished in Bristol Bay since 2020. I strongly oppose proposal 44 & 61 through 68. Changes in this plan before it comes to its full fruition could undo years of collaborative work made by the fishing community including commercial, sport, and subsistence fishermen. I want to be able to commercial fish for a long time and I fear that altering this plan might affect my future in this industry. I respectfully request the Board allow the plan to be unchanged. Thank you for your consideration and time.

Best,

Casey Marinkovich

Fred Marinkovich

[REDACTED]
Gig Harbor WA 98329
United States
[REDACTED]
[REDACTED]

December 15, 2025

Board of Fish, Alaska State Troopers

I would like to bring attention to some inappropriate fishing practices that came to my attention this past 2025 season in Bristol Bay.

While fishing in the Naknek/Kvichak district last season I witnessed fishing vessels round hauling their gear (bringing their nets aboard over the stern/bow roller with fish in it, and pilling it on the stern/bow) with up to as many as 1000 fish in it. This method of harvesting takes place when boat are possibly drifting over district lines, or losing water on the ebbs with fish in their nets. This method of harvesting is, and has always been part of the Bristol Bay fishery. I do not have a problem with that.

What I do have a problem with, and what I do believe needs to be addressed is: After some of these boats round haul their nets with loads of fish in them, they run back into the district, or into deeper water, and set their full nets back out into the water with dead fish in them. I believe this is done because it is easier and faster for some fishers to clean their nets by picking them on the drum, rather than the traditional method of cleaning their gear. Watching these fish getting beat up and flying out of the gear as they are getting re-set over the stern/bow roller is something I've never before witnessed in my 50 years of fishing, and would hope it would not become a normal fishing practice.

I don't know if the BOF can take any action on this, or if this is something that the Troopers need to address? I do know that if the proper language is not installed to put a stop to this activity, it will simply keep happening.

Thank you for time, Fred Marinkovich

Submitted by: Fred Marinkovich

Community of Residence: Washington

Board,

My name is Fred Marinkovich, I have been a stakeholder in the Bristol Bay Salmon fishery for over 50 years.

I would like to OPPOSE Proposals 44 & 61-68.

There was a lot of time and effort involved in putting together the current Nushagak District King Salmon Stock of Concern Management Plan.

I do not believe we have given this current plan enough time to evaluate how it is working.

Please keep the current Nushagak King Salmon Stock of Concern Management Plan in place, with no changes. Thank you for your time,

Fred Marinkovich

Submitted by: Mason Marinkovich

Community of Residence: Washington

To whom it may concern,

I have been a permit holder in Bristol Bay for 10 years. I oppose proposals 44 and 61-68. The current fishery plan should remain unchanged. Not enough time has elapsed to determine if the current plan is effective.

Submitted by: Matt Marinkovich

Community of Residence: FRIDAY HARBOR, WA

Hello BOF staffers and organizers

Thank you for all the work you do putting together the BOF meetings, and compiling these comments. I'm not sure if I submitted my comments in the most efficient way, but I said my piece where necessary (in other submissions), and I appreciate the opportunity to do so.

On this submission I am simply electing "support" or "oppose" on proposals which I have not yet commented. I have no specific comments on these proposals.

Thank you

--Matt Marinkovich

Submitted by: Matt Marinkovich

Community of Residence: FRIDAY HARBOR, WA

I support Proposal 91, suggesting horizontal surfaces be allowed on outdrive guards.

I am the author of this proposal. The intent and purpose of this regulation is completely for safety. Most every outdrive guard already has horizontal surfaces affixed upon them; this proposal would clarify these are allowed for safe human access to the outdrive.

Thank you for your thoughtful consideration regarding this important concern.

Sincerely,

Matt Marinkovich

ALSO, Please see attached for comments on proposal #81, of which I am opposed.

Thank you

--Matt Marinkovich

I am the author of Proposal 95, and I am in support of this proposal.

I have greatly condensed and clarified the explanatory section of Proposal 95 (see below). I realize the version I submitted was confusing and too long. I would appreciate if this version were considered throughout the meeting process.

My suggested regulation modifications are unchanged, except for a clerical error I found in my proposed language, 06.37(b)(2), which I corrected.

My intention for this proposal is absolutely for the purpose of safety among the drift gillnet fleet. Every year I see captains, crews, and vessels go to sea unprepared for the season, because they do not adequately test-run their equipment/crew in the early season. I believe this proposal will create an opportunity for better preparedness by many fishermen who are now neglectful, and who go to sea with underprepared crews, and unseaworthy vessels.

Please read this more concise version of Proposal 95, and please consider entering this into regulation.

Sincerely,
Matt Marinkovich

PROPOSAL 95 *(condensed and clarified)*
5 AAC 06.370. Registration and reregistration.

Modify early season registration requirements, as follows:

Change 5 AAC 06.370 to read as follows:

(a) Before taking salmon in the Bristol Bay Area, a CFEC salmon drift gillnet permit holder shall register for a district described in 5 AAC 06.200. Before taking salmon in the Nushagak District, a CFEC salmon set gillnet permit holder shall register for a statistical area described in (l) of this section. A CFEC salmon drift gillnet permit holder also shall register for the same district the drift gillnet vessel that the permit holder will be operating. For the purposes of this section, a CFEC salmon drift gillnet permit holder and a drift gillnet vessel may be registered in only one district at a time and a CFEC salmon set gillnet permit holder in the Nushagak District may be registered in only one statistical area at a time. Initial district registration and statistical area registration is accomplished by completing a registration form provided by the department and returning the completed form to the department office in Dillingham or King Salmon or electronically on the department's website.

(b) Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district. Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration **or unregistration** form is

signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

06.37(b)(1): Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered, **or intending to unregister the permit**, shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district, **or before unregistration takes effect**.

06.37(b)(2): Prior to 9:00 a.m. June 25, except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder may elect to unregister their permit, by which they are not transferring to a new district, nor shall they remain eligible to fish in their existing district; rather the transfer shall unregister their permit from fishing in any district. Effective after the 48-hour district transfer notification period, the permitholder may again register their drift permit as described in 06.37(a).

06.37(b)(3): Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration/**unregistration** form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

What is the issue you would like the board to address and why?

When a Bristol Bay drift permit holder renews their permit, it starts out as unregistered, and stays that way until it is registered to fish in a fishing district.

Once a Bristol Bay Drift permit holder registers their permit to fish in any district, they are not allowed to unregister their permit. This means their permit must remain registered in one of the fishing districts, or be waiting through a 48-hour transfer period, for the entire season, until ADFG waives the transfer period at the end of the season. There currently is no way for a permit holder to unregister their permit once it has been registered.

An unregistered permit is perceived as advantageous to many drift gillnet fishermen because they can wait until it is blatantly obvious (due to large fish volumes in a fishing district) as to

where they may want to start their fishing season. For this reason many fishermen wait to register their permit until late in the season.

Starting late in the season, without a proper vessel “shakedown” or hands-on crew training, is unsafe for many reasons. Unfortunately, for the reason stated above, many fishermen make this their common practice.

This proposal offers a solution that will allow late-starting fishermen a chance to test-run their vessels in the early season, yet still maintain their perceived late-start advantage. This will lead to greater safety in the fishery.

The situation as it currently exists:

If a permit holder wants to immediately start fishing in a fishing district, they have to keep their permit unregistered until they choose to fish. Many fishermen wait until there are abundant fish in the district they choose to fish, before they register their permit. This often means the vessel and crew have a hurried and unprepared start to the season, which can lead to unsafe vessel operations, and under-trained (and unsafe) crew members.

Situation if this proposal were enacted:

A drift permit holder who registered their permit to fish in a Bristol Bay regulatory area (besides Togiak) may elect to unregister their permit, provided this choice is made prior to 9:00 a.m. June 25. If they choose to unregister their permit, they must stand down from fishing for a 48-hour period. After the 48-hour waiting period, their permit will again be unregistered. This unregistered permit can then be registered in any fishing district (besides Togiak) and the permit can start fishing immediately after registering.

This proposal allows fisherman time to field-test their boat and “break in” their crew before heavy fishing. It will reduce the risk of injury or catastrophic incident by allowing “first-opening problems” to be encountered and addressed in a stress-free state of mind, in good weather, and with no dramatic profit-driven variables in play.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was developed in cooperation with ADFG biologists.

PROPOSED BY: Matt Marinkovich

VESSEL LENGTH PROPOSALS

I am in support of proposals 82-91, all of which deal with vessel length (I am the author of Proposals 84 and 91). Technology and ingenuity have advanced over these years, but the regulations haven't. While no single proposal from this slate is likely to be the best solution, it is clear there is a problem that must be corrected at the 2026 BOF.

ADFG Enforcement has clearly stated they would like an *enforceable* regulation regarding length. All 10 of these regulations seek to clarify the currently vague definitions that has led to the confusion regarding vessel length and its enforceability.

These regulations were modified first in 1981, then nine years later in 1990, then eight years after in 1998. It is now 2025, and **it has been 27 years since the last modification to 5 AAC 06.341**. Since AAC 06.341 was first written, vessel design has evolved dramatically. It is time for a **regulation that encompasses all of the previously-allowed modifications**, yet is easy to enforce going forward.

No fisherman would intentionally violate the length limit; any current violation is a result of a past vessel builder believing they were within the regulation because of the interpretation of this vague rule. Builders certainly verified their idea through enforcement, but now these rules are under scrutiny because enforcement seems to be viewing things from a different perspective. A length-of-hull increase will be the most simple modification to clarify the regulation. Plus, it will allow for **safer** and **more efficient** vessel designs.

Vessels currently under length-scrutiny are owned by all sectors of the Bristol Bay fishing community; those from within the watershed, within the state of Alaska, and those from the lower-48 and beyond. A sound and fair clarification of this regulation will benefit all Bristol Bay fishermen.

Please, Board of Fish members, use sensible consideration in resolving this contentious issue. Thank you for your thoughtful consideration on this important matter.

Sincerely,
Matt Marinkovich

I support Proposal 84, suggesting a 26-inch increase in boat length to 34'2" total, exclusive of outdrives and outdrive guards.

I am the author of this proposal and offer new information to clarify the intent of this proposal.

32' is the current limit the hull of a vessel. An additional 18" is allowed for a non-buoyant trim tab (on the stern of the vessel), and an additional 8" for a non-buoyant anchor roller (at the bow). These already-allowed length-additions total 26", which is the basis of my proposal.

My proposal does not consider length added to a vessel by the outdrives or out-drive guards as a length consideration, which vary in length depending on the type and manufacture of the propulsion unit. These are already defined by regulation as an operational component that does not provide floatation or planing surface.

This proposal would eliminate confusion concerning the definition of a non-buoyant outdrive (externally-mounted propulsion unit), and the fact a jet propulsion unit, which starts within the hull and then extends beyond the transom, has negative buoyancy in the portion within the vessel's hull. To counter this negative buoyancy, builders added a box of up to 4", which extends beyond the transom of the vessel. The interpretation at the time qualified this construction method; it was built on a number of vessels, and seemed to be the industry standard. Now this same building design is up for speculation.

This proposal would allow for this type of jet installation. If there is no consideration towards this arguably-allowed design, the result would be a severe vessel modification, which would most likely result in removing length from the bow of the vessel. This would severely impact the safety of the vessel when in heavy seas, as the diminished wave-cutting action of the bow may result in "blowing out" forward-facing windows of the vessel. This could result in a total loss of the vessel, and loss of life at sea.

This proposal will also eliminate the need for mention of trim tabs, stern rollers, and mechanical equipment mounted outside the transom, which is also currently a point of confusion surrounding enforcement of the 32' limit.

Thank you for your thoughtful consideration regarding this important concern.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 81, which would allow fish traps in Bristol Bay.

Fish traps were outlawed in Washington and Oregon in 1934-35, and Alaska in 1955 and 1959 (after statehood). They were banned for economic reasons—A fish trap can catch ALL the fish, so there is no need for a fishing fleet. Russia (a communist nation) uses fish traps extensively to catch salmon, and has no commercial salmon fleet of gillnet or purse seiners.

Use of fish traps in Bristol Bay would destroy the fishing economy of the region. It would consolidate all the fish-catching to the processor, and they would not need a fishing fleet. I could write 10 pages of the devastating effects of this for economic reasons.

Our fleet of drift gillnet boats would become useless. Only the permit holders would benefit, and would likely wind up becoming consolidated, because the person attached to the permit wouldn't be necessary.

Use of fish traps would also eliminate salmon advocacy. It would eliminate salmon fishermen, and thereby it would eliminate those who care about salmon, which would open up the region to other industries like the Pebble Mine.

No, no, no. For a MILLION reasons, NO FISH TRAPS.

Thank you

Sincerely,
Matt Marinkovich

I am opposed to Proposal 92, which would close the Naknek Kvichak district on July 25.

The late season sockeye run, in all districts, lasts into mid-August. While the majority of the sockeye run has passed, there are pulses of fish that provide good fishing opportunity to the few fishermen who choose to fish late.

Silver Bay Seafoods (SBS), a major processor in Bristol Bay, quit buying fish in the Naknek district in recent years, as follows: July 25 in 2022; July 29 in 2023; July 31 in 2024; and July 25 in 2025. SBS not buying indicates there's not much out there, and most of the fleet will be off the water by then. With this as an indication, there is scarcely a reason to enforce a hardline closure by regulation.

Shutting down an entire district, especially the district in which the majority of late-season processors operate, could lead to an earlier shutdown of a company's entire Bristol Bay buying operation. A company's decision to continue processing depends on the number of boats fishing (and fish-volumes caught) to make their operations feasible. Most of the drift and setnet fleet wrap up their season by July 20, so the daily processing volume is already greatly reduced; losing an entire fishing district's catch would greatly impact the decision to remain in business.

This proposal depends on pure speculation that the small commercial effort at the end of the season is harming the silver run. Perhaps the silver run is being impacted by seal predation, rather than late-season gillnets? Both sport and commercial fishermen would agree there is a significant problem with seal predation—there are more seals now than ever before. How about a study exploring this idea?

This proposal needlessly pits the sport and commercial fishermen against each other. It is a shallow-minded argument, and would do very little to change the health of the Naknek silver run.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 44, which would require a limit and “punch-card” reporting for king salmon caught by area T subsistence and commercial fishermen

There are many reasons why this is a bad idea:

- 1) Commercial fishermen own a permit which allows them to catch fish without a limit. So long as any king salmon caught (either sold or retained) are recorded on the fish ticket at the point of landing, it really doesn't matter how many king salmon are retained for personal use. The only difference is who gets the king salmon—the processor (if sold) or the fisherman (if retained).
- 2) We eat a lot of fish when we are fishing commercially in Bristol Bay. Suppose we caught a king salmon every day (which we don't); we could eat a king salmon for dinner only 12 times during our 40-day season. Sockeye is a great replacement, but does it really matter if we eat more than 12 king salmon? We're catching them anyway...
- 3) PAPERWORK... How much paperwork can we create for no reason? Who is going to pay for all of this paperwork and data processing? Perhaps AK Salmon Camp, inc is offering to pay the bill?
- 4) RETAINED fish has long been a way for commercial fishermen to bring fish home for dinner. It is not an abused system—nobody is scamming anything or selling fish on the black market. And most of the “homepack” fish I see are sockeye, because they are plentiful and easy to catch. So why create hassle and paperwork for no reason?
- 5) Every and any king salmon a commercial fisherman wants to retain for consumption AFTER the season must be held in a freezer somewhere. This means the fish must be somehow transported to a freezer on land, since there is usually not a freezer on the boat. There is a lot of logistics just to homepack a king salmon. It might happen with a few fish, but it is likely not more than 12 king salmon, which is quite a bit of fish! Again, this proposal seeks to address a problem that doesn't exist.
- 6) SUBSISTANCE PUNCH CARDS? Really? Again, how much paperwork can we create? Subsistence fish are already recorded, why do a punch card? And are we really suggesting to limit subsistence catch?

There are more reasons why this is a bad idea, but you get the idea. There are a LOT of reasons why this proposal should not pass. Please do not support this proposal—it is a bad idea.

Thank you for your time in being on the Board of Fish

Sincerely,
Matt Marinkovich

I am opposed to Proposals 61-69, which deal with the Nushagak King Salmon Management Plan.

The main reason for my objection is because the management plan in place has not been around long enough to have attained its targeted data collection. Any change to the plan will “reset” the data by changing the parameters or objectives. Please allow the management plan to be in place for a full life cycle of the king salmon. It will give good baseline data that will help in the future.

Toward the purpose of consistency, I oppose Proposal 67, which seeks to close sport fishing if the king salmon stocks are critically low (this seems to make sense—I wish they would have thought about it in the first place). Again, this would change the data, and would taint the science behind the plan.

Please follow through on the original, well-thought out plan, which is balanced and fair to all users. Please do not alter the Nushagak King Salmon Management Plan.

Sincerely,
Matt Marinkovich.

I support a version of Proposal 50, with amendments, as follows:

The author of Proposal 50 suggests to create “**06.335(e): The department shall strive to manage the Bristol Bay commercial salmon fishery for the highest level of product value with a minimum of waste.**”

I would like to offer this amendment to this proposal:

06.335(e): The department shall strive to manage the Bristol Bay commercial salmon fishery with a minimum of waste.

(1) Any fish brought aboard a set or drift gillnet vessel shall not intentionally remain enmeshed within the gillnet when the net is again deployed into the water.

I am proposing this language because of what I witnessed this (2025) season in the Bristol Bay drift gillnet fishery. I watched drift fishermen (several different fishermen on different occasions) haul their nets aboard with fish in them, onto their decks (“stern haul” style), or onto their net reels (with fish still in the net), and then instead of taking the time to pick the fish out of their net before re-setting the net, they made no effort to pick the fish, but rather set their net back out with fish still in the net (in one instance, there were very many fish held in approximately 75 fathoms of net that they had to haul “stern-haul” style so they would not drift over the line—they set it back out with fish still in the net, likely because it was the quickest way to get their net back into the water; they had no concern for wasting the fish that were lost from their net). This is blatant waste of the resource, as many of these fish fell out of the net when the net was re-set. It also is blatant quality degradation, as those fish would have “gone through the ringer” if they made it back to the boat to be later sold into the market.

I left out mention of quality in my proposed language because of its subjective nature. Simply stern-hauling fish aboard a boat has little-to-no quality impact on the fish, if it is done with thoughtful consideration toward quality. Contrarily, very long sets (over three hours in the water), or hard towing of a gillnet, or towing a gillnet full of fish over a sandbar or across a mud flat, are all quality-degrading drift fishing techniques that nobody is bringing forward to ask for preventative regulation. Quality demands should be and are originated from the processors, and should not be administered through regulation.

Please accept this amendment to Proposal 50. It is important to stop this wasteful practice of intentionally setting a net with fish still enmeshed within the net. There was no accident in what I saw—these fishermen did this because it was the fastest way to return their nets into the water to catch more fish. If there is no ramification for this practice, it will continue, and so will this shameful waste of our resource.

Thank you for your consideration of this important concern.

Sincerely,
Matt Marinkovich

I support proposal 53, which utilizes the western SHA boundary line in Egegik to deter illegal fishing in the late season.

I am the author of this proposal.

Once again, Egegik had boats fishing over the northern boundary line in the late season. Perhaps there weren't the number of calls with complaints as the year before, because the fishery remained open despite this illegal fishing. Maybe those who called in 2024 didn't want to be responsible for shutting the down the whole Egegik district because they reported illegal fishing?

Proposals 71-74 all suggest opening the General District (opens up the entire east side, without boundary lines). All four of these proposals cite this as necessary **because of illegal fishing in Egegik.**

It is blatantly apparent there is a problem with late-season illegal fishing in Egegik. The General District will work to eliminate illegal fishing at the Egegik north line, but it is quite apparent that ADFG and other interests are not interested in opening the General District (the General District discussion at the 2023 BOF meeting was very short; there was no discussion, just agreement by the BOF that the General District should not be utilized).

This proposal offers a localized solution that will stop illegal fishing at the Egegik northern boundary line, because it will eliminate the north line. If fishermen want to fish in Egegik, they can fish up in the district. The SHA west line makes Egegik smaller, but with the little number of boats fishing in the late season, there is still plenty of room to fish.

Thank you for your consideration, and thank you for standing on the Board of Fish.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 92, which would close the Naknek Kvichak district on July 25.

The late season sockeye run, in all districts, lasts into mid-August. While the majority of the sockeye run has passed, there are pulses of fish that provide good fishing opportunity to the few fishermen who choose to fish late.

Silver Bay Seafoods (SBS), a major processor in Bristol Bay, quit buying fish in the Naknek district in recent years, as follows: July 25 in 2022; July 29 in 2023; July 31 in 2024; and July 25 in 2025. SBS not buying indicates there's not much out there, and most of the fleet will be off the water by then. With this as an indication, there is scarcely a reason to enforce a hardline closure by regulation.

Shutting down an entire district, especially the district in which the majority of late-season processors operate, could lead to an earlier shutdown of a company's entire Bristol Bay buying operation. A company's decision to continue processing depends on the number of boats fishing (and fish-volumes caught) to make their operations feasible. Most of the drift and setnet fleet wrap up their season by July 20, so the daily processing volume is already greatly reduced; losing an entire fishing district's catch would greatly impact the decision to remain in business.

This proposal depends on pure speculation that the small commercial effort at the end of the season is harming the silver run. Perhaps the silver run is being impacted by seal predation, rather than late-season gillnets? Both sport and commercial fishermen would agree there is a significant problem with seal predation—there are more seals now than ever before. How about a study exploring this idea?

This proposal needlessly pits the sport and commercial fishermen against each other. It is a shallow-minded argument, and would do very little to change the health of the Naknek silver run.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 48, which seeks to establish a 2:1 driftnet/setnet ratio in the Kvichak River Special Harvest Area (KRSHA).

I have been a drift net fisherman, fishing primarily in the Naknek/Kvichak district, for over 35 years.

This proposal depends greatly on supposition and conjecture. I have fished in the Naknek River Special Harvest Area (NRSHA) through the years referenced in the proposal; every year is a different experience—there is no way of accurately predicting what will be the situation of the drift and setnet fleets, and the decisions they make if or when the KRSHA is employed.

The 3:1 ratio is tested and has proved effective in the NRSHA. In fact, this proposal's author states that he authored the 2006 proposal that created the 3:1 opening, because the set netters sat out for 9 tides in 2005. By my recollection, 2005 had a huge lull in returning fish right in the middle of the season—there were no fish to catch, which might be why the set netters did not fish for so long. Had the set netters been trying to catch their allocation during the lull they may have gone 4 or 5 openings before the drift netters fished...

I am not comfortable with using wild guesses and conjecture as a baseline of fact. The 3:1 ratio has worked with the NRSHA, and if we ever (unfortunately) are forced to fish in the KRSHA, we will find out if the 3:1 rotation is effective there as well.

REGARDING the author's suggestion it would be more helpful to the drift net fleet if the setnet buoys were removed for the drift fleet; I disagree. When fishing in close-quarters situations like a special harvest area, obstacles create opportunity. As a drift netter I would prefer to have the set net buoys in place out to 500-feet, rather than having them removed.

I clearly see this proposal as an attempt to shift fish-catching opportunity from the drift net fleet to the set net fleet, without a solid basis as to why it should be that way.

Thank you for your consideration in this important matter.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 49, which seeks to establish a variable ratio of setnet/driftnet fishing opportunity in the Kvichak River Special Harvest Area (KRSHA).

I have been a drift net fisherman, fishing primarily in the Naknek/Kvichak district, for over 35 years.

The author of Proposal 49 mentions the 84:16 split, citing how even though the set netters are allowed more fishing time, the drift netters still catch more fish. This is because a drift net vessel is not confined to the riverbank, and can venture out to where large bodies of fish are entering through the middle and further reaches of the district, over 10 miles downstream from the set netters.

If the Kvichak River Special Harvest Area (KRSHA) is employed, the whole drift fleet will be stuffed into basically the same area where the setnet fleet fishes—there is scarcely enough room for the whole drift net fleet, plus we are fishing only 75-fathoms or our normal 150 to 200 fathom complement of gear. More than half of the drift net fleet would normally be over 10 miles south and catching an entirely different body of fish, so the competition for fish in the KRSHA has doubled, with less than half the net.

The above considerations reflect why there is a 3:1 ratio between drift/set net fishermen. And no matter how many drift vessels or permits are participating in the fishery, the drift fleet will catch the same amount of fish; there is never enough room in a Special Harvest Area. Also, most of the fish in the area will be caught during a drift opening. This means there is a limited number of fish that the same number of boats will be catching. It will actually be HARDER for the drift fleet to catch their 84% of the allocation, so the 3:1 ratio is important to maintain.

OTHER POINTS TO PLEASE CONSIDER:

This proposal focuses only on the number of driftnet permits that are registered to fish to determine the variable drift/set openings. Why is there no consideration for the number of setnet permits participating in the openings? Surely, with this would factor into the resulting 84:16 allocation split.

Also, the proposal focuses on the number of drift permits registered, and not the number of drift vessels. Many of the vessels would be fishing a D permit, but every vessel would fish the same 75-fathoms of gear, regardless of how many permits are registered to the vessel. So linking the variability factor to the permits is unreasonable.

I see this proposal, like Proposal 48, only as an opportunity to shift fishing opportunity from the drift fleet to the setnet fleet, without a foundation of fact or sensible reasoning.

Thank you for your consideration in this important matter.

Sincerely,
Matt Marinkovich

Submitted by: Pepper Marinkovich
Community of Residence: Tacoma, WA

Oppose Proposals 44, 61-68.

Submitted by: Jon Markey
 Togiak River Lodge
Community of Residence: Jasper, Georgia

the proposal submitted by Togiak River Lodge is very straightforward and eminently logical and would have no negative impact on the fishery.

Submitted by: Rex Martin
Community of Residence: Danvers, MA USA

Proposal 102 seeks minor, pragmatic adjustments to sport fishing regulations in the Togiak River drainage, emphasizing enforceability and alignment with fish behavior without undermining core conservation measures for king salmon (Chinook). These changes are low-risk, supported by biological data, and fit within the Alaska Board of Fisheries (BOF) adaptive management process. They enhance compliance and recreational access while maintaining protections for a stock of concern.

King salmon in the Togiak River remain a "stock of management concern" due to persistently low returns, leading to the 2023 BOF closure of the river to all king salmon fishing year-round (no retention allowed, with mandatory immediate release). newsrelease.adfg.alaska.gov

Proposal 102 does not challenge this; instead, it proposes allowing bait (e.g., prawns) from July 11 (vs. current July 16) to target sockeye salmon, which have robust runs—the 2026 Bristol Bay sockeye forecast is strong, with escapement goals frequently met in the Togiak District. adfg.alaska.gov

By mid-July, most kings have migrated upstream to spawn, reducing incidental bycatch risk, especially with existing rules requiring unbaited, single-hook artificial lures/flyes year-round outside bait periods. adfg.alaska.gov

The boundary adjustment—from Gechiak Creek (mid-lower river) to the Pongo River (an upper tributary)—shrinks the open area for king targeting, better protecting spawning grounds. Radio-tagging studies show 84% of kings spawn in the mainstem Togiak River, with many in upper reaches above Pongopukepuk, and tributaries accounting for ~15%. fishwithjd.com

This move aligns regulations with actual spawning distribution and angler practices, as the river's remote, braided nature makes the current Gechiak boundary hard to enforce in the Togiak National Wildlife Refuge. aws.state.ak.us

These changes support multi-user fisheries (sport, subsistence, commercial) in Bristol Bay, where salmon sustain ecosystems and economies (~1-2 million returns annually). adfg.alaska.gov

By making rules more enforceable, it could reduce violations and aid Alaska Department of Fish and Game (ADF&G) monitoring via aerial surveys. researchgate.net

Under Alaska Administrative Code (5 AAC), BOF proposals like this enable data-driven tweaks to sustain fisheries amid challenges like climate change (e.g., warmer waters affecting kings). akleg.gov

Proposal 102 is "clean and common-sense," as described, and its adoption could model effective advocacy—practical, targeted, and rooted in science.

PC142

Submitted by: Scott Martin

Community of Residence: Petersburg

To the members of the board,

My Name is Scott Martin. I am a resident of Petersburg, AK and I am an owner/operator of a drift gillnet boat in Bristol Bay.

I would like to voice my opposition to proposals 61 and 62. I believe that we need to give the current king salmon management plan more time to prove whether it is working or not before making such drastic changes.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I believe the board should also consider the potentially harmful impact of largely over escaping the nushagak watershed with sockeye salmon.

Thank you for taking the time to read this, Scott

PC143

Submitted by: Vanessa Martin

Community of Residence: Petersburg, Ak

My name is Vanessa Martin, I'm a 28 year old Alaskan Resident and I've slowly worked my way into owning a boat and permit in Bristol Bay. (F/V Kamanu). I oppose the Proposals 61 and 62. The plan has only been in place for three seasons and was not expected to produce immediate results given the 4–7 year life cycle of Chinook salmon. I believe we should let it play out and give it a chance to do something before we change it up again.

I also think that we need to think about the sockeye run. If we let the sockeye way over escape and they don't have enough room to spawn the sockeye run could take a huge hit and it could take decades to recover from that. Please consider opposing these proposals. Thank you for your time.

PC144

Submitted by: Dennis Martishev

F/V unknown

Community of Residence: Wasilla

Please do not shut down Nushagak district till the 28. That's going to be to big of a financial loss for my family. There's other ways of King management.

PC145

Submitted by: Andrey Martushev

Community of Residence: Homer, AK

My name is Andrey Martushev on the F/V Tremor. I've been a Bristol Bay permit holder almost 20 years.

I strongly oppose Proposals 44, 61-68,

For example proposal 61; opening the season on June 28 which is about 10-12 days later than the regular season. This would significantly impact the fishery, not just on loss of harvest of over 7 million sockeye but over escapement of the rivers impacting the return on the salmon to the area. Also starting at a later date the financial loss of many fisherman relying on this fishery as their lively hood, would be devastating. The Bristol Bay run is very quick and short to begin with which would definitely cause over escapement. And you need to seriously look into the trawlers that scoop up and ruin the sea floor and catch more salmon than we drift netters can ever harvest. Please take this into consideration. Thank you!

PC146

Submitted by: David Martushev

Community of Residence: Homer Alaska

My name is David Martushev. I am a boat owner and Bristol Bay drift gillnet permit holder from Homer, Alaska, with 15 years of experience fishing in Bristol Bay.

I strongly oppose Proposals 44 and 61-68.

These proposals would hurt commercial fishing in the Nushagak District by delaying openings, closing the sockeye fishery longer (like until June 28 in Proposal 61), and changing the management plan. This could cost the fleet over 7 million sockeye in good years and devastate fishermen, crews, processors, and communities that rely on this short season.

The Nushagak King Salmon Stock of Concern Management Plan was adopted in 2023 after years of input from stakeholders. We haven't seen it through a full cycle yet—changing it now reduces flexibility and puts the full burden of conservation on the in-river commercial fleet.

While we all want strong king returns, real solutions need to address major sources of mortality outside Bristol Bay. For decades, Bering Sea pollock trawlers have taken tens of thousands of Chinook salmon as bycatch every year—often 20,000-50,000+ in the pollock fishery alone (per NOAA/NMFS data). Genetic studies show some of these are Western Alaska stocks, including fish that could return to Bristol Bay systems. Recent examples include over 35,000 Chinook bycaught in 2023 across Bering Sea/Gulf trawlers, and incidents shutting down fisheries after hitting caps. Trawlers operate under federal

management with bycatch caps, but those caps are still high enough to remove thousands of kings that never reach Alaska rivers.

Bristol Bay directed fishermen already follow strict escapement goals and conservation measures. It's not fair to restrict our harvest further without stronger action on offshore trawl bycatch—a problem we've highlighted for years.

Please reject Proposals 44 and 61–68 and keep the current plan in place.

Thank you.

PC147

Submitted by: Kiril Martushev

Community of Residence: Homer

Hi, my name is Kiril Martushev on F/V Billet. I've been a bristol bay permit holder since 2017. I rely on bristol bay to get me through the winter so I strongly oppose proposals 44, 61-68.

PC148

Submitted by: Mihael Martushev

Community of Residence: Homer, AK

I'm a 30 year Bristol bay fisherman and I oppose proposals 44 and 61-68.

PC149

Submitted by: Sergei Martushev

Community of Residence: Homer

Leave proposals unchanged! As a BB permit holder we already keep getting early season fishery pushed to later dates than we have in previous years. Each season they are trying to take more and more fishing time from the fleet. Detrimental to a fisherman/small buisness.!!

PC150

Submitted by: Stifan Martushev

Community of Residence: Salem Oregon

We need a proper management plan for bristol bay, so far the current proposals are not that.

Submitted by: Eric Marxmiller

Community of Residence: Out of State

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Eric Marxmiller. I am a Bristol Bay set net fisherman and permit holder submitting written testimony on the referenced proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern (SOC) Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game. It has been in place for only three seasons and was not expected to produce immediate biological recovery given the 4–7 year Chinook life cycle.

Available analyses indicate the plan is functioning as intended by delaying openings, reducing fishing time during peak Chinook vulnerability, lowering commercial exploitation, and increasing escapement.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Eric Marxmiller

Submitted by: Gregory Marxmiller

Community of Residence: Dillingham

I think proposal 44 is not very well thought out and should be rejected out of hand. Priority should be subsistence, commercial, sport in that order. At least in the Nushagak as that is considerate to local needs. To think that people should have to sacrifice being able to eat so someone can make a dollar is shortsighted at best.

I am in favor of proposal 57 as this is a huge issue for Ekuk and the Combine. I have had to replace gear because of drift entanglement in my setnet gear. I did not propose a seaward boundary for the combine as I am hoping that this proposal is sufficient to add some respect for other gear types.

Proposal 59 seems self serving by one gear type. Setnetters didn't create the allocation or the three to one rule. We have made the best of it. Drift has had the WRSHA to itself a couple of times in the last seven years. Fair is fair.

I oppose lengthening nets for setnets on the Wood River special Harvest area in proposal 60. Because of the unique riverbank in the area the first four sites on either side exponentially catch more fish than anyone else. There have been many enforcement issues and proposals written because of the conflict for those sites. This would exacerbate an already contentious area. It would also allocate more fish to the first few sites and spread even less fish to other fishers in the harvest area. If anything the extra net should be given to fishers from the fifth site on up the river or from 500 feet from the south line.

I oppose proposal 61. It adds regulation and hampers the ability of the Area Biologists to make real time decisions regarding King Salmon escapement. I don't think this is in the interest of best decision making in a dynamic environment. It may not be a shared view but I think everyone is interested in King Salmon escapement. Especially the Fish and Game management team. Hampering their abilities for three years with proposals like this may have unintended consequences that are onerous to all user groups.

I oppose any additional lengthening of boats or nets for the drift fishery the 32 foot rule has worked and it keeps things fair. Allowing more nets and ownership of nets with out a similar rule for setnet seems unfair. Sure id like more than 50 fathoms if I had another permit holder but not allowing that keeps things equal. Multiple proposals

PC153

Submitted by: Joseph Masui
Bristol Bay

Community of Residence: Homer

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Joseph Masui, I am a drift gill net fisherman (owner/ operator) in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Joseph Masui

F/V Tonsina Bay

Mikal Mathisen

Bristol Bay drift permitholder/boat owner/operator 1996-present

Proposals 44, 61-69 – Nushagak King Salmon Stock of Concern Management Plan

I oppose any and all proposals making changes to the Nushagak King Salmon Stock of Concern Management plan. The plan was developed over a five year period and has only been in place for three years. The King Salmon life cycle is 4-7 years so we haven't even made it through to the low end of one life cycle. The available analyses say the plan is working as intended. During the 2023-25 seasons the commercial fleet started 2 to 5 days later than previous seasons and allowed an additional 7,982 to 11,190 king salmon past the sonar counter. Commercial fishing time has been reduced by an average of 240 hours per year prior to July 5. That is a 42% decrease in time from the previous management plan. All of this adds up to a commercial fishing king salmon exploitation rate of 10%. Prior to 2023 the commercial exploitation rate was 23%. If the June 28 start date were in effect for 2025 the commercial fleet would have missed out on 7 million sockeye. At 5.1 pounds/fish and \$1.70/pound that is over \$60 million dollars in lost revenue to the fleet. The district managers must be allowed to manage without date constraints over their heads.

Proposals 45-47 – Registration dates

I oppose changes in the Naknek emergency order dates. The area manager already has the ability to keep the 48 hour transfer period in affect during years of low escapement.

Proposals 48-51 - Kvichak Special Harvest Area

I oppose these proposals. We haven't had any Kvichak special harvest area openings yet and have no idea what if anything needs to be changed.

Proposal 52 – Upper Egegik Section

Neutral

Proposal 53 – Egegik Special Harvest Area

I oppose the idea of a late season smaller district.

Proposals 54-55 – Silver Management

Support

Proposal 56 – Nushagak set net seaward boundary

Neutral

Proposal 57 – Nushagak set net fishery boundary preventing drift boats from entering

Oppose. Distance between gear type regulations already exist. There is no reason to shut drift boats entirely out of an area.

Proposals 58–60 - Wood River Special Harvest area

Neutral

Proposal 70 – Ugashik North Line

Neutral. I'm all in favor of more area to fish, but this extended boundary line throughout the season would likely effect escapement patterns in the Egegik and Naknek/Kvichak districts.

Proposals 71-74 – Late season general district

I support any or all of these proposals. It would be a much better fishing style conducive to late season scratch fishing. With the fleet spread out the opportunity for late July Kings and Silvers to get by would be increased. It would also allow the fleet to move away from the seals that harass the participants on the east side. I would suggest coming up with a boundary line between Naknek and Egegik and a boundary line between Egegik and Ugashik to give all three areas a similar sized district and make sure the fish taxes go to the proper boroughs. Escapement is no longer being counted at this point so a general district should not biologically affect the fishery. We are also likely to see more resident effort in the late season with a general district fishery.

Proposals 75-78 – Dual permit for one operator

Support. Every boat operating as a dual permit improves the fishery for the rest of the fleet. We are heading into smaller forecasts and need to continue to make changes to increase the fishery value to the participants. Since the 2022 season our forecast has cut in half. Less boats and less gear in the water mean more fish for everyone else. It also leaves more room in the water for Kings to get past the fleet. We have developed a lease fishery and people are making money by not fishing. Between 2020 and 2024 an average of 257 medical transfers took place. I don't think that was ever the intention of limited entry. The current rule is costing fishermen tens of thousands of dollars annually. As it stands now a single operator must lease a second permit in a crewmember's name if he wants to fish a 200 fathom net. At the end of 10 years he will have nothing to show for all that money going to non-participants in the fishery. If instead of leasing for 10 years that same person obtained a bank loan and made payments for 10 years he would now own his own second permit. One of the arguments against permit stacking has always been that it will make it harder for new entrants in the fishery. I disagree as it is the value of the fishery that determines permit pricing. Also it should be noted that Bristol Bay Economic Development Corporation (BBEDC) has a loan program in place for watershed residents.

Proposal 79 – Ugashik set net offshore distance

Neutral

Proposal 80 – Set net joint venture

Neutral

Proposal 81 – Non entanglement nets

I oppose the idea of different gear for harvesting in Bristol Bay

Proposals 82-91 – Vessel length

I support with amendments cleaning up the vessel length issue. Unfortunately, most of these proposals just go down the road of redefining existing definitions of trim tabs, gillnet rollers, anchor fairleads and anything else sticking off a boat beyond 32 feet and adding miscellaneous length limits to these extremities. I see two possible ways to clean this up. My first recommendation is to come up with an overall length that the vessel in its entirety fits within. I

believe this idea is what the troopers prefer. Most of the current jet boats have as much as 3 or 4 feet of a guard off the back of the boat plus a foot or more of anchor roller/fairlead off the front. If we went to an overall length of 37 feet I think 99% of the existing fleet would fit within. This would also allow smaller boats in the fleet to add length to their boats increasing buoyancy and stability. Many boats have added RSW systems and travel around with slack tanks of water. Increasing stability and buoyancy by lengthening these boats would make them much safer and could be done for considerably cheaper than a new build. A second option to clean up the length limit is to keep the boats at 32' and allow any and all non flotation items beyond that. Anchor rollers, jet guards, outdrives, keel coolers, etc could all go beyond the 32' buoyant hull. It should be noted that when measuring purse seine vessels in Alaska the anchor roller/fairlead does not count as part of the measurement. If nothing is clarified we probably end up with no length limit in the near future and let the logistics of Bristol Bay determine what size boats people end up with.

Proposal 92 – NK closure July 25

Oppose.

Proposals 93-94 – Togiak Fishing Periods

Neutral

Proposal 95 – District registration/reregistration

Support with amendments. I agree with this proposal but would move the unregister date up to 900 am June 17. This would line up with the start of the Egegik emergency order period and still allow the fleet time to get out and test their equipment and crew in early June.

Proposals 96-104 – Sport fishing

Neutral

Proposal 105 – King Management

Oppose

Submitted by: Erik Maudslien

Community of Residence: Seattle

Dear Members of the Alaska Board of Fisheries,

My name is Erik Maudslien, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

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I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Erik Maudslien

F/V Pinnacle

[Learn More](#)

Disclaimer: The information provided by BBRSDA is intended to support member awareness and engagement in the Board of Fisheries public process, including consideration of Proposal 41 and Proposals 61–68. BBRSDA does not speak on behalf of individual fishermen or permit holders, and any positions expressed in written testimony are those of the individual submitting the comments. Members are encouraged to review all proposals in full and submit testimony that reflects their own perspectives and experiences.

Frances Bursch/

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ADFG 2025 Preliminary Run Summary

Upcoming BBRSDA Meetings & Events

BBRSDA Board Meeting

December 17, 2025 at 10 am AK

Teleconference - AGENDA

Sign up for Bristol Bay Waypoints, eNewsletter, which will keep you informed on matters that directly affect our fishery.

Sign Up

Untitled.jpg

Check out our consumer facing website

bristolbaysockeye.org

Bristol Bay Regional Seafood Development Association | (907) 677-2371 | info@bbrsda.com

PC156

Submitted by: Seth McCallum

Community of Residence: Petersburg Alaska

I oppose proposals 61, 62, 68, 69 that address the king salmon management plan in the Nushagak river.

I think these would negatively affect the commercial fishery in a way that would effectively destroy the current fishery in the whole Bristol Bay area. More restrictions to protect the king salmon without giving proper time for the current management plan seems misjudged. I think the most important thing the department needs to do is figure out how to accurately count the kings coming into the river already. As a commercial drifter in Bristol Bay I can confidently say that closing down the season more than we already are will not improve escapement to the levels needed. Interception of kings seems few and far between. Net size restrictions, closing certain areas of high king abundance, better counting techniques, closing home pack for drifter and setnet operations from non locals, and better counts of king salmon from lodges and guides might be better places to start. Restricting commercial set and drift fisherman would be detrimental to the fishery, as we have already lost so much time to the existing restrictions for king salmon. If the fishing time for commercial fishermen is further restricted, then fisherman will have to move to other rivers. I'm hoping the board will see that these proposals will harm commercial fisherman in a way that will destroy the fishery.

I support proposals 70, 71, 72, 73, 74 addressing an open district at the end of the season.

I believe this will allow for more late season opportunity and allow a more fair playing field for the fleet. Late season fishing has gotten so out of hand with people fishing over the line in Naknek and Egegik that it makes it completely unworkable. Having more room would make it much easier to safely and legally complete the season.

I support proposals 75, 76 for D Permit stacking.

This would be a great way to improve the fishery. It would allow people to invest into the fishery and take net out of the water, allowing more opportunity for fisherman in Bristol Bay. This would also help

king salmon escapement in the Nushagak, as less net in the water would allow more kings to swim through. Without high volumes of sockeye, this fishery will not make sense unless the value of the salmon actually rises a substantial amount. There are too many boats fishing the bay as a study has shown in recent years.

Boat length restrictions.

I personally believe that the 32 foot limit is a very out dated regulation. It has made the fishery much more dangerous than needed. I think the anchor roller proposal would be an easy change. However the proposals also seem to mostly help people who have built these huge jet boats without much thought of the 32 foot length. I think most of the new boats have 6-8 feet of machinery hanging off the stern which seems bizarre that is allowed.

Proposal 95

I support this proposal and think this one of the best proposals for the fishery. This would allow fisherman to test their gear and provide green crews much needed practice early in the season. Then having the ability to "unregister" your permit would allow the fisherman to watch the escapement numbers and Port Moller numbers and be able to make an informed choice and pick any district to fish in. It would also allow the Department of Fish and Game to keep track of the fleet, as boats would not be able to buzz back and forth between districts, which was a problem in the past. I really hope the board can pass this proposal to allow the fisherman this proposal.

PC157

Submitted by: Kyler Mccarthy

Community of Residence: Bozeman MT

Proposal 62 if passed will almost ensure over escapement of sockeye every year in all 3 major nushagak river systems. By June 28th in all likelihood 5-10 million fish will be up the Nushagak, and in years past that is accurate figure for June 28th if you include harvest. In terms of dollars, assuming 5 lb average, 50 million lbs of fish and at \$1.5 a lb. This will cost the Bristol Bay Commerical Fisherman \$75 million dollars a year, which in turn costs the state money via the fish tax. Fisherman in the bay have already been stretched thin with higher expenses and lower fish prices over the last 3 years. This is not what is best for the overall economic health of Bristol bay and its communities.

PC158

Submitted by: Edward McDonnell

Cozy Ray

Community of Residence: Dillingham, AK

Proposal 84

OPPOSE

COMMENT:

I strongly oppose Proposal 84 and any efforts to increase the 32-foot vessel length limit. Raising this limit will only further the wealth gap in the fishery, creating a competitive disadvantage for the majority of the fleet who operate existing 32-foot vessels. It shifts the advantage to those with significant capital

who can afford to build newer, larger boats, leaving smaller, local operations disparaged and unable to compete. The current 32-foot limit has successfully maintained a level playing field for decades, and removing it effectively forces an expensive "arms race" that many permit holders cannot afford.

Proposal 57 – OPPOSE

Topic: Gillnet specifications and operations (Establish shoreward boundary for drift gillnets/Ekuk Beach)

Comment:

I oppose Proposal 57 regarding the new boundary restrictions on Ekuk Beach. This proposal acts as a "land grab" to secure more exclusive space for set netters in a section of the Nushagak where they are already extremely successful and have access to the most profitable sites. The current regulatory system is sufficient to prevent conflict if set netters utilize well-defined buoy markers and lights to make their gear visible. The issue is often not the spacing itself, but that set netters have been enabled to use hidden anchors, rails, and other sinkable items that create underwater hazards and rip up drift nets. We do not need new exclusion boundaries; we need better visibility and marking of set net gear to ensure safe navigation for all users.

Proposal 56 – OPPOSE / COMMENT

I oppose making these boundary definitions permanent without addressing the underlying issues of gear visibility and hidden hazards. Establishing these rigid boundaries largely benefits one user group while restricting the drift fleet's traditional access. The focus should remain on proper gear marking (lights and buoys) rather than expanding or locking in exclusive zones that limit drift fishing opportunity.

PC159

Submitted by: Bryce Mckinley

Community of Residence: Los Angeles, California

Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Bryce McKinley, I am a set net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

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Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Bryce McKinley

F/V Baby Mary

Kvichak Setnetters Association

PC160

Submitted by: Wynn Mckinnis

Community of Residence: Palmer Alaska

Hello, my name is Wynn mckinnis and I am in opposition to proposals 44, 61-68. As a drift permit owner in the Bristol bay salmon fishery, these are very concerning to me especially that of prop 61 that the Nushagak district would be closed until June 28th at 9am with no exceptions. In the past the Department has allowed for certain triggers to prompt fishing time before the 28th of June. Getting rid of these triggers to conserve the passage of king salmon would potentially result in over escapement and loss of revenue generation for the state.

Wynn Mckinnis

PC161

Submitted by: Eric Meyer

Community of Residence: Sitka, AK

Proposals 45-47: I support these proposals. By extending the date to the 22nd from the 17th, it will allow Eastside Biologists to manage the Naknek/Kvichak district based on allocation and run size for a longer period of time, often when large volumes of fish are still returning to our district. It could also reduce the number of forced down days between the end of emergency order period and when the “free week” schedule begins on the 23rd.

Proposals 48-49: I strongly support any proposal that creates a more fair balance in the drift to set ratio in the Kvichak River Special Harvest Area. The 3:1 ratio is antiquated and does not create a fair balance in allocation. That ratio was created for the Naknek River Special Harvest Area in the 90s when the drift fleet was comprised of vessels that were less mobile and long before “D” boats were ever established. I believe the ratio in the NRSWA should be changed as well to reflect this change in the fleet, but particularly should be addressed now when establishing the KRSWA. If stocks become a concern and managers start to look towards utilizing these special harvest areas, drift participation in that district goes down due to their ability to transfer to another district. Setnetters are stuck in the mud per say, and have no option to fish elsewhere. I believe proposal 49 creates the most fair ratio based on drift participation, but due to the complexity of it, it may be impractical, and if that is the case, then a set 2:1 ratio should be adopted.

Proposals 61-62: I strongly oppose anything that prioritizes the management of king salmon over sockeye salmon. I understand the importance of protecting a stock of concern, but prioritizing a fish with small return numbers over the dominant species that brings so much economic value to the region is a

big problem for the fleet, and particularly local fishers. It can also create issues of over escapement that can create far reaching implications to the fleet, as well as future runs.

Proposals 64-65: I oppose these proposals for similar reasons as proposal 61 and 62. They prioritize sport fishing for king salmon over the commercial sockeye industry. They restrict the Westside Biologist's ability to manage sockeye abundance for harvest.

Proposal 70: I strongly oppose increasing the size of the Ugashik District. Interception of fish bound for a district is an issue for all districts. If the issue of concern is interception of stocks bound for Ugashik, particularly from the Area M district, restrict Area M rather than increase Ugashik. Increasing the Ugashik district size would increase interception of stocks bound for Egegik and the Naknek Kvichak.

Proposals 71-74: I strongly oppose creating a general district in Bristol Bay. Fish and Game Biologists have the difficult task of managing each river system for their sustainability of future seasons. Each river system is what is known as a "terminal fishery", meaning that the fish are harvested in the district in which they were bound. That is the reason that interception is a concern for all districts. Harvesting salmon in a general district eliminates the "terminal" portion of the fishery and would make it impossible for biologists to record and document run strength in each river for future stocks, as well as their ability to manage in-season allocations set for each district. That is the reason that the general district management plan was abolished before, and that should be upheld.

Proposal 92: I strongly oppose this proposal. Even though most fishers have typically gone home by this date, this eliminates even the possibility of a fisherman in Naknek/Kvichak district to continue fishing beyond the 25th. The people this would hurt the most are locals who live in the area and can continue to fish.

Proposals 105 & 185: I oppose the creation of a king salmon management plan in the Naknek/Kvichak district, as well as the other rivers that do not currently have one. King salmon numbers are down across the entire state of Alaska, and across the entire West Coast, not just the Bristol Bay watershed. They are a stock of concern everywhere, and it is unknown why these numbers are declining. Meanwhile, Bristol Bay sockeye runs are as strong as ever, and maintaining the sustainability of those runs should continue to be the priority of Fish and Game Biologists in Bristol Bay.

PC162

Submitted by: Caleb Mikkelsen

Community of Residence: Wasilla

58) No, just limits the biologist more

60) No, changes allocation in favor of a small area.

61, 62, 68) No, more restrictions and we have yet to see a full King age return from previous King Conservation change.

71, 72, 73, 74) Yes, we NEED a general district after enforcement leaves. The lawlessness is awful!

75, 76, 77, 78) No, monopolizes permits and keeps younger generations from affording permits. This will increase the price of permits.

80) No, hard to enforce, and the imitations for a set net were clear when the permit was bought.

85) Yes, clear, enforceable, and does not change the intent of the previous regulations while adding some new age technology improvements for fish quality.

86) yes, it clarifies the current intent of the regulations. It allows older smaller boats to use the full competitive extent of the regulations.

87)Yes, transom coolers allow fish to be continuously chilled under all circumstances, this new technology helps quality be easier without changing original intent of the regulations.

90) yes, it gives a very clear, enforceable, measurable limit that does not change the original intent of the regulations.

92)No, way too restrictive and way too early. This would drastically reduce many peoples late season fishing plans. Kvichak is known for later runs and this could allow for loss in a lot of fishing revenue.

PC163

Submitted by: Laura Mikkelsen

Community of Residence: Wasilla, AK

58. No, this just limits the biologists

75-78 Strongly oppose permit stacking in any way. Hurts the younger generation and make it harder for them to start up

80. No. Hard to enforce. Gets abused.

85. Yes. Good overall length

87. Yes. We need transom coolers. They greatly increase fish quality as they make RSW systems more fool proof and efficient

88. Yes. Simplify

90. Yes. Clear definition

92. No. Too restrictive

PC164

Submitted by: Roger Mikkelsen

F/ Abundance Owner and Bristol Bay Bristol Bay Drift Permit Holder and Fisherman
since 1987

Community of Residence: Dallas, Oregon

My comments are in relation to the massive foregone harvest and potential over escapement resulting from the policies attempting to conserve Nushagak King salmon. As a Nushagak drift fisherman, I would like to see more options to catch the early sockeye, while protecting the king salmon as much as possible. Examples would be: allowing short high water openers, restricting mesh size to 4.5", splitting the district to East and West sides and only allowing fishing on the East Side during the early season.

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Mary Miner, and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. Three generations of my family have fished on Ekuk. My father first came to the beach, then his daughters, and now my children. It is a part of our family history and each one of us cherishes the opportunity to return year after year.

I submit the following comments as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose family depends on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Mary Miner

Ekuk Beach, Nushagak District

Submitted by: Tom Montecucco

Community of Residence: Naknek

Late season fishing has always been a bandits paradise. Legal fishermen are not allowed to harvest. Please do the right thing and take their power away.

Submitted by: Brendan Mulholland

FV Katana (Bristol Bay Drift)

Community of Residence: Blaine, WA

Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Brendan Mulholland, I am a drift gill net captain and owner in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

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I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Brendan Mulholland

FV Katana

Submitted by: James Nash

Community of Residence: Mount Vernon, Washington

I oppose proposals 44, 61-68.

I have fished in Bristol Bay for 56 years as crew and owner and operator of five boats. I have fished all districts but got my start in the Nushagak.

I believe that there has not been enough time given to the current plan in order to evaluate its effectiveness. One change at a time after thorough examination of the data, allows for better management.

Please allow the current plan to stay in effect until at least the 2023 run of Kings has had a chance to mature, allowing for a more complete evaluation of the plan's effectiveness.

Submitted by: Mark Niver

Community of Residence: Wasilla

I support permit stacking, general district.

Submitted by: Daniel Nolan

Community of Residence: Knik Alaska

I am an Alaska resident Bristol Bay salmon fisherman with 8 years in Bristol Bay. I believe the current management plan has the best ability to properly conserve and steward the amazing resource of Bristol bay salmon. Basing opening decisions on in season data and actual run timing has proven itself as an effective way to produce a sustainable surplus for everyone who uses Bristol bay salmon.

Placing arbitrary dates for commercial openings ties the hands of biologists who are trying to manage resources in the best way possible.

Submitted by: Patrick Nolan

Community of Residence: Knik

It is in the best interest of the resource to leave the management plan unchanged. All of the drastic measures taken in other fisheries to increase King salmon stocks have proven unsuccessful. The current plan is conservative giving biologist Leeway to respond as necessary in an emergency in season without ruining the viability of the entire resource by mandate

Submitted by: Dan Norman

PC172

Community of Residence: Kenai

I oppose Proposal 61 because critical data, mostly fish counts, remain unreliable. The range of 40%-60% of the chinook salmon are not counted by the sonar. The causes of Chinook decline are broad, locking in strict harvest restrictions via Proposal 61 will hamper adaptive, science-based management due to reliance on wildly uncertain sonar counts.

I believe the better path is to focus first on improving assessment and monitoring then work to adopt more flexible, adaptive protection measures.

And until the State can address the elephant in the room and take on the trawlers and the wanton waste of tens of thousands of chinook, we continue to fight for the scraps left to Alaskans by the trawl fleet.

PC173

Submitted by: Jessica Normandeau

Community of Residence: Victor, ID

I am commenting on proposal 44 and 61-61. I highly oppose these proposals. As a Bristol Bay commercial fisherman and permit holder I feel these proposals show a massive lack of understanding of the nuances of the Bristol Bay salmon fishery and are misguided in their resolve.

PC174

Submitted by: Erik Noste

Community of Residence: Washington State

Against Proposal #70. It appears to be an effort to increase interception of other rivers fish. According to Table 70-1 24% of the Ugashik catch in 2024 was made up of Egegik bound fish.

PC175

Submitted by: Mark Noste

Community of Residence: Carlsbad, CA

Proposal 70 This seems like a plan to intercept more fish for the Ugashik fleet.

According to table 70-1, 24% of their catch was headed for Egegik in 2025. In 2022, only 56% of their catch were Ugashik fish. Moving the outside line outward would only exacerbate the problem of catching other districts' fish. It's clearly stated in the Proposal that this would, "increase harvest in the Ugashik District... and include intercepted fish from other districts...."

By the way, I am a member of the proposing association and I disagree with their stance. They are an insurance pool. What are doing making proposals about District Boundaries?

Christine O'Connor Public Comments, Bristol Bay Finfish Meeting

December 29, 2025

Alaska Board of Fisheries, Bristol Bay Finfish Meeting

Madame Chair and Members of the Board,

My name is Christine O'Connor, and I have been setnetting on Ekuk Beach in the Nushagak District for more than 40 years. I am a setnet permit holder and member of Ekuk Beach Fishermen's Association. My family and I rely on the Bristol Bay fishery and are committed to being part of a sustainable and orderly fishery for generations to come.

I respectfully offer the following comments regarding several proposals the Board will be considering at the Bristol Bay Finfish Meeting.

Public Comment Supporting Proposal 56: Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery.

I strongly support Proposal 56. The outer boundary adopted in 2022 for setnets along Clark's Point and Ekuk Beach, has allowed us to have confidence that our sites are placed within the requirements of regulation. The boundaries are a big improvement from the prior language, which created a lot of uncertainty due to use of the terms mean high and mean low water, which are not easily identified or enforced. Continuing to use the boundaries going forward will support a stable, orderly fishery on Ekuk Beach.

Public Comments Supporting Proposal 57: 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.

Background

In recent years setnetters on Ekuk Beach and Clark's Point Beach in the Nushagak District have experienced repeated damage to their equipment and lost significant fishing time due to entanglement and physical conflict with drift boats and nets. As the fishery has evolved to include many larger boats with significantly more horsepower, these conflicts have increased.

We operate our set gillnets on Ekuk Beach using running lines, passed through steel blocks, and secured to 8-foot iron pegs driven into the beach and seabed. This is very challenging because extreme currents in this area create tremendous pressures on lines, anchoring pegs, and nets. These currents are created by extremely large tidal fluctuations in the Nushagak Bay, ranging from -4 to +24 feet. High tides can be driven even higher by wind, creating even stronger currents.

Because of the intense pressure of the currents and tides on our setnet gear, when a drift boat hits the lines or nets, they exponentially increase the pressure and often cause damage. Even minor contact can be catastrophic for a setnet operation, and results in broken lines and nets, disturbed anchors, and fouled pulleys. When this happens, we must replace very expensive equipment – a running line costs more than \$2,000 – and are not able to continue fishing our site for a minimum of one tide. Depending on where the site is located the entire season can be compromised because the outer anchors are only accessible during the lowest tides of the year. These gear-type conflicts can also endanger harvesters on the beach when lines and nets under extreme tension are cut and

recoil. These conflicts are entirely avoidable, and can be prevented by separating the gear types as Proposal 57 describes.

Gear-type Conflict

Gear-type conflict incidents are not isolated, they occur regularly and have caused both safety hazards and significant economic loss. Below are some examples of the problems Ekuk and Clark's Point setnetters are experiencing:

1. In 2024 Taryn O'Connor and her crew were pulling their setnet onto the beach near the Ekuk Cannery, using a truck to clamp onto the line and tow the net onto the beach. While the truck was attached to the upper end line and pulling the net, a drift boat drove across that line, between the net and the beach, cutting it and causing a dangerous recoil on the line. The net then swung out into the current where it could not be reached from the shore. This incident damaged the line, compromised the operation of the setnet site, and endangered crew on the beach. It was completely unnecessary and avoidable. The boat did not need to drive between the net and the beach, and over the line. Unfortunately, as the regulations are currently written, there is very little enforcement can do in these situations. Only drift web contacting setnet web is prohibited. Proposition 57 would prohibit this kind of activity by fully prohibiting drift boats and equipment from contacting setnets and equipment.
2. In 2024 Serena McArthur was nearly hit by a drift boat while operating her setnet skiff along the Clark's Point beach. Ms. McArthur and her crew were working with their skiff on the inside 10 fathoms of her setnet (very near shore) when a drift boat ran between the skiff and the beach, narrowly missing her and her crew. Skiff-based operations work by positioning their boat under their net and running line. Therefore, the drift boat adding downward tension to the system is extremely reckless in addition to the near collision with Ms. McArthur's skiff and family. Clark's Point setnets cannot be more than 600 feet from the beach, yet a drift boat endangered the setnet crew, skiff, and gear by driving through the gap between the shore and the setnet, and over the setnet lines. Again, this was a completely avoidable and unnecessary action by the drift boat, which endangered a setnet crew and interfered with the setnet operation.
3. The Sanborn family, who setnet at Etolin Point near the southern line of the Nushagak District, had their running line cut during the most productive tides of the 2025 season. During an active setnet and drift opening, a jet-driven boat, apparently chasing shallow fish, became stranded on the Sanborn's site as the tide went out. In an apparent effort to quickly avoid detection while entangled in the Sanborn's gear, and under the cover of darkness, the jet-boat captain wallowed out a hole in the mud on top of the Sanborn's outer anchors, cutting the setnet running line. Repairing the damage to the setnet site took multiple days. Given the relatively limited fishing time on this section of beach, this extremely labor-intensive repair prevented the Sanborns from fishing three consecutive high-water tides. Those high-water tides are the only fishing opportunities available on this section of beach. This scenario happens in some form or fashion routinely, but would be prevented by separating the gear-types.
4. In 2024 my running line was cut soon after the beginning of the first opener when significant fish were in the district. We had to pull our net immediately and were unable to reset it because the tide was incoming rapidly, and the running line was loose in the current and could not be recovered to tie to the net again. Normally our site catches a

comparable amount of fish to our neighbors', During that tide our neighbor's site caught over 11,000 pounds. We only caught 3,389 pounds from the initial minutes of the period before our line was cut. The damage done to our site during this one tide cost us approximately 8,000 pounds of catch, which would have been worth \$8,800.

5. Despite the known strong currents and winds along Ekuk Beach, drift boats routinely attempt to tow their nets in a zigzag pattern along Ekuk Beach to weave between the setnet sites and closer to the beach. These boats begin their drift outside the outer setnet marker and drag the net closer to the beach in between setnet sites, and then tow it back outside the next outer marker, and make their way down the beach weaving between setnet sites. However, due to the strong currents along the beach, the drift nets and even the boats themselves often run over the setnet's outer anchors, pulley, buoys, and lines entangling and routinely damaging them.

There is not physically enough room to tow a 1,000' driftnet between setnet sites and still maintain the minimum 300' of separation between gear required by 5 AAC 06.335. Setnet sites are required to have a minimum 450' separation along Ekuk, so it is very likely that when these drift nets are towed in between two setnet sites, they are not maintaining 300' distance from the setnets on either side.

6. Drift nets entangling with setnet outer equipment routinely cut net lights and marker buoys from outer anchor pegs. Once these markers are torn away, and until they can be replaced, it is very hard to tell where the outer anchors of the setnet site are. This exacerbates the problem of conflict between gear types because when drift boats cannot see the outside end of a setnet site, they are more likely to drive or drift over anchors and running lines, increasing likelihood of additional damage. Outer marker buoys can only be replaced during some low tides, or not at all during the season depending on the topography of the site. And while the outer buoy is missing, the setnet permit holder has been placed in violation of regulation through no fault of his or her own.

Common-Sense Solution

Proposal 57 is a common-sense solution which would eliminate conflicts between drift and setnet gear in two ways. First, it uses boundaries already in regulation to separate gear types. 5 AAC 06.331(n) already defines outer boundaries for setnet sites from Clark's Point to Etolin Point, setnet equipment may not be placed or operated outside these limits. Under this proposal drift operations would use the same boundaries to stay outside setnet operations. These boundaries are easily determined so compliance is simple and enforceable for all harvesters. Second, the proposal adds new language explicitly prohibiting drift equipment from contacting setnet equipment, further eliminating gear damage and hazards to harvesters.

Using the existing boundary to separate drift operations from setnet operations will allow all harvesters to fish without conflict. Setnets, by their very definition, are anchored in place and do not move beyond the outer boundaries already defined in 5 AAC 06.331(n). If this proposal is adopted, drift nets would remain outside the same boundary, eliminating gear entanglement. Setnetters would fish as they always have, and drifters would continue to fish along Ekuk, but without causing damage to setnet equipment or impeding setnetters' harvest opportunities.

Drift gear conflict with setnet sites along Ekuk Beach has required significant enforcement effort. In 2024 there were so many incidents of damage to setnet operations that the Alaska Wildlife Troopers had to increase their patrol of the waters along Ekuk to try and discourage drift

Christine O'Connor Public Comments, Bristol Bay Finfish Meeting

encroachment on setnet sites and equipment. Resolving this issue would allow scarce enforcement resources to be dedicated appropriately throughout the region. The existing coordinates and boundaries are already familiar to harvesters and enforcement officers. Adopting this boundary between gear types would simplify enforcement, reduce user conflict, and allow both gear types to fish productively.

There is broad support for this proposal from the harvesters most harmed. Twenty-seven Ekuk setnetters co-signed this proposal and the Ekuk Beach Fishermen's Association supports it. ADF&G staff comments regarding Proposal 57 state, "The department SUPPORTS regulations that decrease conflicts between user groups and promote an orderly fishery."

Proposal 57 is a common-sense solution to a long-running problem and would help restore an orderly fishery in the Ekuk and Clark's Point area. It will reduce equipment damage, improve safety for crews on both drift and setnet operations, and allow enforcement resources to be used more efficiently. If this proposal is adopted, all harvesters will be able to operate their gear safely and without conflict along Ekuk Beach and Clark's Point. We thank the Board for considering this practical solution to a long-standing problem and respectfully request that you adopt Proposal 57.

Public Comment Supporting Proposal 80: Allow joint venture set gillnet fishing operations in Bristol Bay.

I support Proposal 80, which would allow us to be more efficient on Ekuk Beach. We have a small operation, with one site and two limited entry permits. Under current regulations we must pull both permit holders away from the site to deliver our fish via pickup truck to the Ekuk Cannery, about 3 miles away over a very rough gravel beach. This is not an efficient use of our crew and vehicles. Proposal 80 would allow us to be more strategic and assign one permit holder to deliver while the other remains on the site to oversee the net and crew. This is a simple change that does not affect other harvesters, and allows us to use our best judgement to manage our labor and equipment. I respectfully request the Board adopt Proposal 80.

Public Comment Opposing Modifications to the Nushagak River King Salmon Stock of Concern Plan.

I oppose Proposals which attempt to tinker with the Nushagak River King Salmon Stock of Concern Plan. It is very important to allow the Nushagak Chinook Management Plan to complete a full life cycle. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle would be premature, and undermines the ability to evaluate whether the plan is working and creates instability for fishing families like mine. I support allowing the Nushagak Chinook Management Plan to work without alterations.

Respectfully submitted,



Christine O'Connor,
Ekuk Setnetter
Member of Ekuk Beach Fishermen's Association

Public Comment to the Alaska Board of Fisheries Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Jamie O'Connor, and I write today as a lifelong participant in Alaska's salmon fisheries, a fifth-generation Bristol Bay set-net captain, and someone who has worked across policy, research, and community organizing to support the fisheries and coastal communities that sustain us.

First, I want to acknowledge the Board's work on the Nushagak Chinook Management Plan. Chinook conservation is deeply personal to many families in Alaska. I support allowing the current framework to operate over a biologically meaningful timeline, long enough to evaluate outcomes across Chinook life cycles. Stability, clear expectations, and respect for the extensive stakeholder process that created the plan that the Board unanimously adopted in 2023 are important not only for conservation but also for credibility and public trust in management.

I also support Proposal 56, reaffirming the predictable, seaward boundary between Clark's and Etolin Points. It improves clarity and enforceability in an increasingly crowded and dynamic onshore fishery. To further this goal, I support Proposal 57, which applies that same boundary to drift operations, keeping drift gear outside the areas where set-net gear is deployed. These boundaries are clear, easy to determine, and straightforward to enforce. The proposal also adds explicit language prohibiting drift gear from contacting set-net gear, reducing gear damage and improving safety for everyone operating on or near the beach.

In recent years, set-net fishermen along Ekuk and Clark's Point have faced increasingly frequent and costly conflicts with drift vessels operating close to shore. As the drift fleet has grown in size and horsepower, boats and nets are routinely passing through set-net lines, anchors, and pulleys. Even minor contact can break running lines, tear web, displace anchors, and create serious safety risks for crews working on the beach and in skiffs. These incidents often occur during short, high-value openings, meaning repairs can cost entire tides, and sometimes the rest of a season if outer anchors cannot be reached. Proposal 57 is needed because these conflicts are no longer isolated events; they reflect structural crowding and unclear expectations in the near-shore zone that can only be addressed by clearly separating gear types and preventing contact.

I authored and support Proposal 80 which would allow limited joint-venture set-net operations. For small, family-based sites, compressed openings and escalating operating costs are real challenges. Proposal 80 offers a carefully constrained way to share labor and logistics without expanding effort, increasing footprint, or opening the door to consolidation. It is a practical resilience tool, grounded in over four decades of experience from Kodiak set-net fisheries.

Finally, I ask the Board to consider the lived experience of Nushagak District set-netters who have consistently fallen short of allocation targets in recent years. Policy language that appears balanced on paper has real, compounding consequences when it is not realized in practice. The financial stress, attrition of local permit ownership, and pressure on small

processors and communities are not abstract trends, they show up as lost opportunity, family economic instability, and declining participation in the fisheries that define Bristol Bay's coastal communities.

I believe strongly that Alaska can protect our stocks, support orderly fisheries, and maintain fair opportunity for the families and communities who rely on them. The proposals discussed here are incremental steps toward that balance.

Thank you for your time, your service, and your ongoing commitment to the fisheries that feed Alaska's economy, culture, and identity. I appreciate your consideration.

Respectfully,

Jamie O'Connor

Bristol Bay Set-Net Fisherman

Homer & Ekuk, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish

Madame Chair and Board Members,

My name is John O'Connor and I have been a setnetter on Ekuk Beach for more than 50 years. I'm a founding member of the Ekuk Beach Fishermen's Association. I respectfully submit these comments regarding proposal under consideration during the Bristol Bay Finfish Meeting.

Opposing Comment – Proposal 44: Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery and report all king salmon harvested.

I oppose Proposal 44 because it conflicts with Alaska's constitutional and statutory priority for subsistence use. Article VIII of the Alaska Constitution, along with AS 16.05.258, requires that subsistence uses be given priority over all other consumptive uses when resources are limited. Proposal 44 imposes harvest caps and reporting requirements on subsistence users that mirror sport fishing regulations, effectively eroding this priority and treating subsistence as a privilege rather than a protected use.

Subsistence harvest of king salmon in Bristol Bay is not a discretionary activity; it is a constitutionally recognized use tied to food security, cultural continuity, and rural livelihoods. The proposal does not demonstrate that subsistence harvest is a primary conservation concern, nor does it show that less restrictive measures have been exhausted before placing new limits on subsistence users.

If conservation measures are necessary, the Board must ensure that subsistence users are the last to be restricted, not the first. Proposal 44 reverses that mandate and sets a concerning precedent that undermines the constitutional preference for subsistence.

Proposal 44 is ineffective for conservation goals. The Nushagak Advisory Committee noted that limiting the number of king salmon taken as home pack by commercial fishermen will not meaningfully reduce overall commercial king salmon harvest. If fish are not retained as home pack they will simply be sold commercially, leaving total harvest unchanged while imposing unnecessary complexity on reporting.

Proposal 44 imposes redundant reporting requirements. In the subsistence fishery, king salmon harvest is already tracked through existing permits and reporting systems. This proposal's reporting requirement may duplicate current processes without providing additional conservation benefit.

For these reasons, I encourage the Board to reject Proposal 44 and instead focus on regulatory changes that would deliver measurable conservation outcomes while respecting historical subsistence practices and data collection already in place.

Opposing Comment – Proposal 54: Repeal the Nushagak River Coho Salmon Management Plan

I oppose Proposal 54 because it would effectively close the commercial salmon fishery beginning August 1, regardless of run strength, stock composition, or in-season management information.

An automatic August 1 closure removes the Department of Fish and Game's ability to manage fisheries based on real-time data, escapement and catch performance, and mixed-stock considerations. Bristol Bay fisheries have historically been managed successfully through adaptive, in-season decision-making rather than fixed calendar closures.

Supporting Comment for Proposal 56: Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery.

I support Proposal 56, which would remove the sunset date and permanently adopt the current defined offshore boundary for set gillnet operations in the Nushagak District on Ekuk Beach. This change would retain a clear, fixed seaward boundary for set gillnets based on specific latitude and longitude markers rather than the unreliable and fluctuating high/low tide measurements that previously defined this limit. The current fixed boundary has provided greater clarity and enforceability for fishermen and enforcement personnel alike.

Making this boundary permanent will help ensure consistent operational expectations for permit holders, improve safety and legal compliance at sea, and avoid confusion caused by constantly shifting beach conditions. The removal of the sunset language gives fishermen and managers the long-term stability they need while maintaining orderly and equitable access to the fishery.

For these reasons, I respectfully urge the Board to adopt Proposal 56 and provide certainty and clarity to the Nushagak District set gillnet fishery.

Supporting Comment – Proposal 57: 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.

I strongly support Proposal 57 because it would codify clear offshore boundaries and gear separation between set gillnet and drift gillnet fisheries in the Nushagak District. Establishing these defined offshore locations improves safety, fairness, and operational clarity for all commercial salmon fishermen.

By adopting the set gillnet offshore markers for the drift fishery and prohibiting gear interactions:

- Safety at sea is enhanced — Clear, regulatory boundaries reduce the risk of entanglement between gear types, lowering hazards for vessels working in close proximity.
- Fishermen have greater predictability — Legally defined locations reduce uncertainty about where different gear types can operate, helping fishermen plan their fishing effort and avoid costly enforcement issues.
- Enforceability improves — Straightforward regulatory coordinates are easier for enforcement personnel to monitor and interpret, which supports compliance and equitable fishing opportunity across the fleet.

This proposal builds on existing management practices that many fishermen already follow and makes them permanent, clear, and equitable. For these reasons, I encourage the Board to adopt Proposal 57 at the January 2026 Bristol Bay Finfish meeting.

Opposing Comment – Proposal 59: Ensure drift gillnet fishing opportunity in the Wood River Special Harvest Area, regardless of allocation.

I oppose Proposal 59 because it would significantly limit the Department of Fish and Game’s ability to balance allocation between drift and set gillnet fisheries using in-season management.

Bristol Bay salmon fisheries depend on adaptive, real-time management to ensure fair and orderly allocation between drift and set gear groups while still meeting escapement goals. Proposal 59 would impose rigid regulatory constraints that prevent managers from adjusting fishing time and opportunity based on run timing, abundance, and allocation. This lack of flexibility would make it difficult—if not impossible—for ADF&G to make corrective adjustments to allocation imbalances between drift and set fisheries during the season.

By removing this management discretion, Proposal 59 risks locking in inequitable allocation outcomes, potentially favoring one gear group over another. This directly conflicts with the Board’s long-standing allocation policies and undermines the balanced management framework that has allowed both drift and set fisheries to coexist successfully in Bristol Bay.

The economic impacts of this proposal would be significant. Reduced or misallocated fishing opportunity affects permit holders, crew employment, processors, and coastal communities that rely on predictable and equitable access to the fishery. When managers cannot respond in season to address allocation disparities, the resulting economic harm is borne disproportionately by fishermen who lose access through no fault of conservation necessity.

Current regulations already provide ADF&G with the authority to restrict fisheries when conservation concerns arise. Proposal 59 does not improve conservation outcomes and instead reduces the tools needed to manage allocation fairly and maintain economic stability across the fleet.

For these reasons, I respectfully urge the Board of Fisheries to reject Proposal 59.

Opposing Comment – Proposals 61 and 62

Proposal 61-Repeal provisions allowing commercial fishing, adopt date-specific provisions for opening commercial fisheries based on king salmon in-river projected run size, and prohibit the retention of king salmon in the sport fishery.

Proposal 62: 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.

I respectfully oppose Proposals 61 and 62 and urge the Board to allow the existing Nushagak River King Salmon Stock of Concern Management Plan to remain in effect for a full life cycle before implementing additional regulatory changes.

King salmon have a 7-year life cycle, and meaningful evaluation of management effectiveness requires allowing current regulations to operate through at least an entire generation. Changing management direction before a full life cycle has passed prevents managers and the Board from accurately assessing whether the existing plan is meeting its conservation and escapement objectives.

Proposal 61 would replace adaptive, in-season management with rigid, date-specific provisions and does not include any allowance for early run timing for both Kings and Sockeye. In years when king salmon migrate earlier than average, fixed calendar triggers may unnecessarily restrict mixed stock fisheries after the conservation window for Kings has passed. Bristol Bay salmon runs vary significantly in timing, and effective management requires the flexibility to respond to those variations.

The proposal also removes the Department of Fish and Game's ability to respond to real-time biological data, run strength, and in-river conditions. This approach risks both missed harvest opportunity in strong early run timing years and ineffective conservation in late timing years, this may have a worse biological outcome than the existing plan.

The current King Salmon Management Plan already provides ADF&G with the authority needed to protect king salmon when conservation concerns arise while maintaining balanced allocation and orderly fisheries. Allowing the plan to remain in effect for a full life cycle would provide the Board with credible biological data and a stronger foundation for any future regulatory changes.

For these reasons, I urge the Board of Fisheries to reject Proposals 61 and 62.

Opposing Comment – Proposal 69: Adopt a recovery goal for Nushagak River king salmon.

I respectfully oppose Proposal 69 because the establishment of a recovery goal for Nushagak River king salmon should be developed through the Nushagak River King Salmon Stock of Concern Management Plan Committee, not set directly in regulation.

The management plan committee process exists to evaluate stock status using the best available science, incorporate updated data over time, and allow meaningful input from managers, biologists, and stakeholders. Setting a recovery goal through regulation removes that flexibility and risks locking in a target that may not reflect changing environmental conditions, run timing variability, or long-term productivity trends.

Additionally, the current King Salmon Management Plan has not yet been in place for a full king salmon life cycle. Allowing the plan to operate through a complete generation is necessary to accurately evaluate its effectiveness before establishing formal recovery benchmarks.

Prematurely setting a recovery goal could lead to unnecessary restrictions or misdirected management actions without sufficient biological justification.

Recovery goals should be adaptive and science-driven, not fixed through regulation without the ability to adjust as new information becomes available. Retaining this responsibility within the management plan committee ensures that conservation objectives can evolve appropriately while maintaining balanced allocation and minimizing unintended economic impacts on Bristol Bay fisheries and communities.

For these reasons, I urge the Board of Fisheries to reject Proposal 69 and allow the King Salmon Management Plan Committee to develop and evaluate recovery goals through the established planning process.

Opposing Comment – Proposals 71, 72,73 and 74: Reestablish a General District Salmon Management Plan.

I respectfully oppose Proposals 71 through 74 because reestablishing a General District Salmon Management Plan for the Eastside Districts would reduce management clarity and negatively impact catch opportunities for terminal river users.

The Naknek/Kvichak, Egegik, and Ugashik systems each have distinct run timing, stock composition, and escapement needs. Managing these systems under a broad General District framework risk shifting fishing effort away from terminal areas where harvest opportunity is most appropriate and biologically efficient. This can result in reduced fishing time and lost harvest opportunity for terminal river users, even when individual river escapement goals are being met.

Terminal fisheries are designed to allow harvest closer to the river of origin, improving stock-specific management and reducing mixed-stock impacts. Proposal 71 could undermine these benefits by prioritizing broader district openings rather than maintaining focused terminal management that supports both conservation and fair access.

Without clear biological justification showing that a General District approach would improve conservation or fishery performance, this proposal risks reducing catch opportunity for terminal river users without providing measurable benefits.

For these reasons, I urge the Board of Fisheries to reject Proposals 71 through 74.

Opposing Comment – Proposals 75 through 78: Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery

I respectfully oppose Proposals 75 through 78, which would allow permit stacking — enabling one person who owns two drift gillnet permits to operate up to 200 fathoms of gear on a single vessel — because it would reduce equitable opportunity, concentrate fishing power, and harm small-scale fishermen and coastal communities.

Allowing permit stacking effectively increases harvest capacity for individuals with greater capital and access to multiple permits. This shift would aggregate fishing effort into fewer vessels, reducing the number of active boats participating in the fishery and concentrating economic benefits among fewer operators. Over time, this could lead to reduced local economic diversity, fewer crew jobs, and diminished community participation in the Bristol Bay commercial fishery, all without a clear biological or conservation benefit.

Smaller operators, new entrants, and families that rely on a single permit for income would be disadvantaged, as they cannot achieve the same efficiency gains without purchasing or leasing additional permits at high cost. This runs counter to the Board's objectives of maintaining broad participation, fair opportunity, and economic stability in the fishery.

Furthermore, concentrating limited entry permits, gear and power into fewer hands is what the limited entry permit system was developed to keep from happening. It was developed in part to make sure the fishing effort was spread out into a diverse effort held by many stakeholders. If one stakeholder is allowed to own multiple permits it could take a disproportionate share of fishing capacity out of the small operators hands. I feel this could lead to more instability for small communities that depend on a predictable salmon harvest from their residents. With seafood job numbers and small communities already under pressure across the state, adding regulatory changes that could reduce economic resilience is unwise.

For these reasons, I urge the Board of Fisheries to reject Proposals 75 through 78 and preserve a regulatory structure that supports equitable opportunity, diversified participation, and long-term economic resilience for Bristol Bay fishermen, crews, and communities.

Supporting Comment – Proposal 80: Allow joint venture set gillnet fishing operations in Bristol Bay

I support Proposal 80 because it would allow small operators and family operations the flexibility to best utilize their resources by allowing one person and delivery vehicle to deliver more than one site's catch. Many of these small operators have to travel long distances to deliver their catch. Many times, this means one vehicle for each site must travel more than 20 miles to deliver a few fish. Allowing a joint venture would allow more of the crew to watch over the catching operation which will improve safety and fish quality. This will also reduce much wear on vehicles and allow small operations to afford reasonable upgrades to one delivery vehicle, which will also improve safety, efficiency, and product quality without increasing gear in the water.

Allowing permit holders to upgrade a single delivery vehicle recognizes the practical realities of operating a small scale set net operation in Bristol Bay. Safer, more reliable delivery vehicles help reduce mechanical failures, weather-related risk, and delays in transporting fish. This improves crew safety and supports higher-quality deliveries to processors without expanding fishing effort.

For these reasons, I encourage the Board of Fisheries to adopt Proposal 80 and allow limited delivery-vehicle upgrades that improve safety and efficiency without expanding fishing capacity.

Thank you for the opportunity to comment on these proposals.

Respectfully submitted,

John O'Connor

Submitted by: Lloyd (Tom) O'Connor

Community of Residence: Dillingham

Tom O'Connor's revised public comments

Madam Chair and Members of the Board,

My name is Tom O'Connor and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. As a majority of my income as well as that of all of my family depends on revenue generated by set-netting in the Nushagak. I will try keep my comments to proposals I think will impact our area and gear type.

I put a high value on protecting Kingsalmon in our district. I was one of the folks that sat on the Nushagak Kingsalmon Management Plan Committee. We spent a good deal of time working on the details of the Plan. I'm opposed to make any significant changes to it at this board cycle. However if the plan does get cracked open I am one of the authors of Proposal 67 and would FULLY SUPPORT Proposal 67 being put forward AT THAT TIME..

While I understand that catch and release mortality studys in the Nushagak appear to show relatively low mortality on Kings. I'm not the first member of the Kingsalmon committee to draft a proposal to restrict fishing Kingsalmon on the spawning areas.

I seriously question whether Nushagak catch and release mortality studies accurately reflect mortality on Chinook caught as far up river as the spawning areas. At this stage of life spawners have exhausted much of their stored energy getting to the spawning grounds.

I think these studies fail to adequately measure reductions in vitality and increased levels of mortality on fish which have a high chance of being caught multiple times on there journey up river and in areas in which they congregate waiting to spawn. While fishing for kings finding a good hole in such areas can be very productive.

I would ask you as Board Members to consider these questions and coments and if you think they have merit, seek answers from ADF&G Staff as well as Other Fisheries Biologists and Scientists who work in and would have knowledge in these areas.

I Support Proposal 54,

In absence funding for basic Counts and biology, the Nushagak Coho Management plan is Unusable.

I Support Proposal 56, which seeks to make the Ekuk offshore set-net boundary permanent. Adopted by the Board in 2022, this regulation has helped as it establishes a clear, predictable, and enforceable seaward boundary. Making it permanent would benefit folks operating both set and drift nets.

I Support Proposal 57 as amended by the Nushagak Advisory Committee.

With a some additional wording which would allow a Drift boat to come to the assistance of a Set net operation there by contacting set-net equipment.

This happens quite often in the event of set net equipment damage or malfunctions.

Similar to proposals 67

I would Support Proposal 66 in the event that the Nushagak Mulchatna King Plan gets opened up but wouldn't

Support opening up the plan just to accommodate either proposal.

I Support for Proposal 80:

As I can see how it would help folks with limited resources deliver fish much more efficiently which would have many benefits including better quality.

I Support Proposals 97 and 101

I'm OPPOSED to proposals

58,59,60 and 64 all of which would make changes regarding operations in the Wood River Speccail Harvest area.

I'm OPPOSED to Proposal 61

I'm OPPOSED to Proposal 62

PROPOSALS 71 through 74 I'm OPPOSED TO ANY Proposal that would create or reestablish a "GENERAL DISTRICT"

I OPPOSE Proposals 75, 76, 77 and 78,

D Permits were originally proposed to help folks stay in the fishery when fishing economics were terrible. They hung in there with the additional realization that D Permits were helping young folks and the like enter the fishery.

I'm apposed to any change to the current regulations concerning D Permits.

I've long been opposed to them being used to Consolidate Ownership of two permits by one person and if adopted would make it tougher for youg people to enter the fishery, dew to less permits being available. Also its thought to have significant potential to speed up migration of Permits out of the Bristol Bay Region.

I'm OPPOSED to 81

I'M OPPOSED TO THE NEXT TEN PROPOSALS ATTEMPTING TO CHANGE THE 32 FOOT LIMIT AND THE WAY IT IS CURRENTLY DESCRIBED IN REGULATION!!

NO CHANGE TO 32' !!

OPPOSED to 95

OPPOSED to 102

OPPOSED to 103

I have some.. Additional Coments related to the Kingsalmon Stock of Concern Management Plan.

BBSRI's Performance assessment for 2024 Nushagak Kingsalmon Stock of Concern Management Plan helps to lay out costs of implementing the plan to various user groups Vs Benefits to Kingsalmon escapement. I wanted to share my thoughts about some of the costs in productive fishing time that may not be as obvious in this report. As the report is speaking to percentages of lost fishing time by commercial fisherman in the coarse of implementing the plan. The Drift Fleet lost 37.1% and Set-net

operations lost 45.9% a difference of 8.8% more fishing time being lost by the Nushagak Set net fleet are obvious

Other Costs / Sacrifices to commercial fishing operations are less obvious. As part of the implementation of The Plan. Drift openings have been starting earlier on the incoming tide. This in part to avoid Kingsalmon as water levels drop toward low tide and Kings which are thought to be more abundant in the channels become more vulnerable. Another reason for moving the Drift openings sooner on the flood is that flood fishing tends to be more productive and the need to harvest reds quickly and efficiently while avoiding lower stages of the tide make flood fishing the fleet arguably make some sense.

Consequently though this timing has a profound effect on diminishing productivity of that fishing time set-net operations are left with. This is because we spend significantly more productive Flood Time fishing behind the drift fleet and fish are being harvested further toward the mouth of the district, dramatically reducing the number of fish in district and available to set-net operations

Another Cost to set-net quality fishing time in the last few years is. Since about 2003 up 2023 Setnet openings started early in the season when fleet size tended to be low. This happened for a couple of reasons. The early set-net openings help assess run strength and timing as fish would be arriving in the Nushagak. Also the early catches helped to balance the gear groups allocation. As the season would be going into overdrive soon with large fleets and large runs, and a need to harvest fish very quickly would drive the fishing schedule. Lately set-net openings don't start until triggers within the Nushagak Kingsalmon Stock of Concern Plan are reached. Consequently in the past few years openings don't begin until fleet numbers are near peak. This results in a further degradation of quality fishing time for Nushagak Set-Nets.

BBSRI's Performance Assessment goes on to point out that the Cost/ Restrictions Commercial fishers have been enduring for Kingsalmon conservation put an extra 6061 Kings through the district and into escapement counts last year. This without exposing them to Commercial Fishing Pressure. It's my understanding that these numbers represent TOTAL Kingsalmon escapement enumerated during the windows of closed commercial fishing and don't take into account any sort of historical exploitation rate of the fleet on Kingsalmon. I.E. Exploitation wouldn't have been 100%. So only some percentages of the the 6061 Kings counts we because of the closers to commercial fishing

For arguments sake let's say that over a 10 year span the documented number of Kings harvested by the commercial fleet averaged about 20% of the total number of kings enumerated in the escapement. Our hypothetical harvest numbers could be questioned by people in management and elsewhere so let's just double the percentages to cushion those concerns. So we arbitrarily get a 40% exploitation rate between harvest and escapement estimates. I know this is a very simple and inaccurate way to lay it out, but it's not so far from how it actually seems to work and help demonstrates some of the possible misconceptions we might have when we only take a quick look at our Plan Assessment.

So in my goofy model 60% of The Kingsalmon Not Exposed to Commercial Fishing Pressure would have made it made it to be enumerated anyway. Much reducing. The 2023 8304 Kings
The 2024 10,794 Kings and The 2025 6,461 Kings

That I may have perceived as saving.

I spent some years on the Nushagak AC and I come to very much appreciate the time and effort you all put in to this. Thank you for considering my Thoughts and Opinions on these matters.

Tom O'Connor

Submitted by: Lloyd Thomas (Tom) O'Connor
Community of Residence: Dillingham

Madam Chair and Members of the Board,

My name is Tom O'Connor and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. As a majority of my income as well as my family's depends on revenue generated by set netting in the Nushagak. I will keep my comments to proposals I think will impact our area and gear type.

I Support Proposal 54

Though I find it baffling that the STATE OF ALASKA refuses to fund basic biology and enumeration of Coho in Bristol Bay.

I put a high value on protecting Kingsalmon in our district. I was one of the folks that sat on the Nushagak Chinook Management Plan Committee. We spent a good deal of time working on details of the Plan. I'm opposed to make any significant changes to it at this board cycle with exception of proposal 67 in which I am one of the authors. While I understand that catch and release mortality studies in the Nushagak appear to show relatively low mortality on Kings I'm not the first member of the committee to draft a proposal to restrict fishing Kingsalmon on the spawning areas.

I seriously question whether Nushagak catch and release mortality studies accurately reflect mortality on Chinook caught as far up river as the spawning areas. At this stage of life spawners have exhausted much of their stored energy getting to the spawning grounds.

I also think these studies fail to adequately measure reductions in vitality and increased mortality on fish which have a high chance of being caught multiple times on their journey up river and in areas in which they congregate waiting to spawn. Where finding a good hole can be very productive.

I would ask you as Board Members to consider these questions and comments and if you think they have merit seek answers from ADF&G staff as well as other biologists who work in and have knowledge of these areas.

I support Proposal 56, which seeks to make Ekuk offshore set-net boundary permanent. Adopted by the Board in 2022, this regulation has helped as it established a clear, predictable, and enforceable seaward boundary. Making it permanent would benefit folks operating both set-nets and drifting.

I Support Proposal 57 as amended by the Nushagak Advisory committee.

I Support Proposal 1

Support for Proposal 80:

As I can see how it would help folks with limited resources deliver fish much more efficiently which would have many benefits including better quality.

I Support Proposals 97 and 101

I'm OPPOSED to proposals

58,59,60 and 64 all of which would make changes regarding operations in the Wood River Speail Harvest area.

I'm OPPOSED to Proposal 61

I'm OPPOSED to Proposal 62

I'm OPPOSED to ANY CHANGES to the 32 foot limit and the way it's defined!!

No to 71 through 74 I'm not surprisingly OPPOSED TO ANY proposal that would create or reestablish a "GENERAL DISTRICT"

OPPOSED to Proposal 75 and 76 and 77 and 78

D Permits made sence at the time

they were originally proposed to help

folk stay in the fishery when fishing economics were terrible. They hung in w there with the additional realization that they wer helping young folks entering the fishery.

They were not advertised as tool to

Consolidate ownership of two permits by one person. Doing so would make it tougher for youg people to enter the fishery dew to less permits being available. Also its though to have great potential to speed up migration of Permits our of the Bristol Bay Region.

I'm OPPOSED to 81

I'M OPPOSED TO THE NEXT TEN PROPOSALS ATTEMPTING TO CHANGE THE 32 FOOT LIMIT ANDTHE WAY IT IS CURRENTLY DESCRIBED!!

NO CHANGE !!

OPPOSED to 95

OPPOSED to 102

OPPOSED to 103

I spent many years on the Nushagak AC and I very much appreciate the time you put in. Thank you for considering my Thoughts and Opinions on these matters.

Tom O'Connor

907 843 0587

Kingfisherhouse@hotmail.com

Submitted by: Alex Oczkewicz

Community of Residence: La Conner, Washington

Dear Members of the Alaska Board of Fisheries,

My name is Alex, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Alex oczkewicz

F/V Dan O

Submitted by: Miles Oczkewicz

Community of Residence: Bellingham, WA

Dear Members of the Alaska Board of Fisheries,

My name is Miles Oczkewicz, and I am a Bristol Bay drift gillnet fisherman. I am submitting written testimony opposing Proposals 44 and 61–68 to the extent that they would modify or further constrain the Nushagak District King Salmon Stock of Concern Management Plan.

While conservation of Nushagak king salmon is critically important, these proposals risk creating unintended and harmful consequences for the sockeye salmon stocks that are the biological and economic backbone of the Bristol Bay fishery. In particular, further delaying or restricting early-season fishing undermines the Board's ability to effectively manage sockeye escapement, increases the risk of over-escapement, and ultimately threatens long-term sockeye productivity.

Sockeye salmon in Bristol Bay are highly sensitive to escapement timing and density. Decades of data show that excessive escapement reduces sockeye productivity due to density-dependent competition for food in nursery lakes. Late harvest opportunities cannot fully correct early over-escapement, especially when large portions of the run pass upriver before fishing opportunity occurs. Once sockeye have passed the fishery, there is no management tool available to address over-escapement, even when escapement objectives are exceeded by hundreds of thousands or millions of fish.

The current SOC plan already delays fishing and significantly reduces early-season effort, allowing large volumes of sockeye to pass upriver before managers can accurately assess run strength. Proposals that further restrict fishing during this critical early window compound the risk of chronic over-escapement, particularly in strong sockeye return years.

This is not a theoretical concern. Bristol Bay has repeatedly experienced sockeye escapements well above optimal goals, and the long-term consequence of these events is reduced future run strength, not increased abundance.

Early-season fishing is not just about harvest. It is a core management tool that allows the Alaska Department of Fish and Game to shape escapement into optimal ranges, maintain age and size structure, reduce in-river crowding and disease risk, and preserve long-term yield from nursery systems.

Proposals that prioritize extended closures or additional constraints during periods of sockeye vulnerability shift risk from one species to another, trading hypothetical king salmon benefits for very real and well-documented sockeye productivity losses. Importantly, the current SOC plan already accomplishes meaningful king salmon protection by delaying openings, reducing fishing time during peak king passage, and increasing king escapement prior to harvest exposure. Weakening sockeye management beyond this point does not represent balanced conservation. It represents a failure to manage for the entire ecosystem.

The SOC plan has only been in place for three fishing seasons. Chinook salmon have a four to seven year life cycle, meaning the Board has not yet observed a single full generation under this management regime. In contrast, sockeye salmon respond immediately to escapement decisions. Damage from over-escapement occurs in real time, with measurable impacts to juvenile survival, growth, and future adult returns.

Altering the plan now, before king salmon data can be meaningfully evaluated, risks locking in sockeye management failures that will not be correctable for years, even if future boards attempt to reverse course.

The current SOC Management Plan represents a difficult but carefully balanced compromise between conservation and sustainable harvest. It already imposes significant restrictions on the commercial fleet and provides increased protection for king salmon.

Proposals 44 and 61–68 would upset that balance by further limiting fishing in ways that undermine sockeye escapement management, increase the risk of chronic over-escapement, reduce long-term sockeye productivity, and ultimately harm the sustainability of Bristol Bay's most important salmon resource.

For these reasons, I respectfully request that the Board allow the Nushagak District King Salmon Stock of Concern Management Plan to remain unchanged and be evaluated over a full Chinook generation before considering additional restrictions.

Thank you for your time and consideration.

Sincerely,

Miles Oczkewicz

F/V Daddy O



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM.C25034

December 19 2025

Ms. Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM), working with other Federal Subsistence Management Program agencies, has reviewed the proposals being considered at the January 2026 Bristol Bay Finfish Meeting. OSM will not provide written comments for this meeting as the proposals involve fisheries that are generally outside of Federal jurisdiction.

While there is little overlap with Federal jurisdiction, many of these proposals still have the potential to affect federally qualified subsistence users. Adopting these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. Furthermore, any of the ten Subsistence Regional Advisory Councils may have submitted written comments on these proposals, and we strongly encourage the Board to consider these comments during its deliberations. OSM may also wish to comment during the meeting on other items that impact federally qualified subsistence users.

We appreciate the opportunity to participate in this process and comment on these important regulatory matters. We look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact Scott Ayers, Deputy Director - Sciences, 907-744-3824 or scott_ayers@ios.doi.gov, with any questions you may have.

Sincerely,

Crystal (Ciisquq) Leonetti
Director,
Office of Subsistence Management

Chair Carlson-Van Dort

2

Cc: Federal Subsistence Board
Interagency Staff Committee
Office of Subsistence Management
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

Submitted by: David Owens

Community of Residence: Peterson

I am opposed to proposition 61 and 62. These will negatively affect my small business and many other small businesses as well. Any effect on my business has an effect on my family. We rely on the income from our commercial fishing business, and this would further restrict our commercial fishing opportunities. Please consider the small businesses and families of Alaska who rely on this early fishing in the Nushagak District to help stay afloat financially as our costs continually go up. Thank you, Dave Owens.



December 29, 2025

To: Alaska Board of Fisheries

RE: Opposition to Proposals 61 and 62

Dear Chair Carlson-Van Dort and Board Members,

The Pacific Seafood Processors Association (PSPA) **opposes Proposals 61 and 62** to set a fixed date and king salmon abundance trigger by which to manage commercial fishing in the Nushagak District and in the case of Proposal 61, also limit the number of hours for the commercial fishery to no more than 12 hours per day from June 28 - July 4. We strongly support retaining the current Nushagak District King Salmon Stock of Concern Management Plan and continually evaluating its effectiveness, given its success so far in both reducing commercial exploitation of king salmon and achieving additional king salmon passage. Please oppose Proposals 61 and 62 and any other proposals to the extent they modify the current plan.

PSPA is a seafood trade association comprised of Alaska seafood processing companies that operate 47 facilities in 22 coastal communities across Alaska, including salmon processing plants in Egegik, North and South Naknek, Dillingham, Togiak, and Wood River. These processors purchase millions of salmon each year in Bristol Bay and support thousands of independent fishermen and many communities dependent on fish taxes and support services. PSPA supports management systems based on sound science and sustainability principles and its members have invested heavily in infrastructure and operations in Alaska's remote communities.

Opposition to proposals 61 and 62 is based on the evidence that the current Nushagak District King Salmon Stock of Concern Management Plan is working as intended and is a more adaptable and responsive plan to managing sockeye and king salmon by using what managers are seeing in-season.

Proposals 61 and 62 would remove the key constructs of the current plan, which is tailored toward conserving king salmon even in the midst of very significant sockeye runs on which fishermen and processors heavily depend. The key changes made in the 2023 plan included:

- *Commercial Fishery Start Triggers*: New triggers for both the Wood and Nushagak Rivers, delay the start of the commercial salmon fishery and thereby afford king salmon additional protection while the ratio of king salmon to sockeye salmon remains relatively high in the district.
- *Sockeye Salmon Optimal Escapement Goals (OEGs)*: Larger escapement targets, scaled to sockeye run size, allow managers to take breaks in sockeye commercial fishing for king salmon conservation and replace the need for prescriptive regulatory changes to time, area and/or gear.
- *Sport Fishery Annual Limit*: Reduced harvest opportunity for large king salmon by limiting anglers to one fish ≥ 28 inches per year. Protecting large, fecund king salmon and safeguarding the reproductive potential of the stock.

While it is not possible to assess the long-term benefits of the plan after only three years given king salmon lifecycles span 4 – 7 years, it is possible to determine that the plan worked as intended and allowed managers to increase escapement of both king and sockeye salmon, while still allowing for opportunities for all users. **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, marking a 57% reduction in king salmon exploitation. Delays in opening the commercial fishery occurred each year, allowing for additional passage of both king and sockeye salmon, with the number of additional king salmon conserved by these delays ranging from 7,982 to 11,190 fish annually (ADFG comments, Table 61-2).** ADFG operated on the conservative side of the plan each year, but clearly within the plan's bounds, by waiting until the triggers were met via sonar or tower counts even though the plan allows ADFG to open the sockeye fishery when the triggers are *projected* to be met. This amount of leeway for managers is appropriate for a plan governing a stock of concern.

The current plan uses king salmon status and abundance as the primary tool both before and during the commercial sockeye fishery to determine when stricter king salmon conservation is necessary and then uses sockeye abundance to determine how those conservation actions are scaled. There was a fundamental reason the BOF used sockeye abundance as the metric for the triggers to start the commercial fishery, given the poor ability of the sonar or towers to fully count king salmon. The sonar is an index (partial count) because it only covers part of the river channel, and tagging and mark recapture studies documented that in some years, 20%–60% of king salmon in the Nushagak River were not counted by the sonar.

The impact of these proposals on the commercial sockeye fishery would be very harmful and unnecessary given the current plan is working and using the best available information to inform management decisions. ADFG comments state the effect of Proposal 61 is there would be no commercial fishing until 61% of the king salmon run timing was complete and limiting fishing to 12 hours per day during that week would reduce fishing time by 25% - 50%. The amount of foregone harvest is unknown but would be significant. Opening the fishery on a fixed date reduces the department's ability to respond to inseason estimates of run abundance of sockeye salmon.

In sum, the first three years of implementation show the 2023 management plan appears to be functioning as intended. Overall, the plan reduced harvest, delayed fishery openings, reduced fishing time, increased escapements of both king and sockeye salmon, and enhanced protection for large king salmon in the sport fishery. This plan was developed over five years with substantial public, Advisory Committee, and ADFG input, and it has only been in place for three years. Please retain the current comprehensive action plan and continue to evaluate its effectiveness over time. Please oppose Proposals 61 and 62 and any other proposals to the extent they modify the current plan.

Thank you for considering our comments.



Julie Decker
President, PSPA

PC185

Submitted by: Carly Patrick

Community of Residence: Seattle

As a longtime stakeholder in the Bristol Bay fishery I strongly oppose Proposals 61-68. Proposal 61 specifically puts a blanket timeline on a fishing start date with no backing of evidence that it will fix the King salmon run. This would have massive economic consequences on the bristol bay fishing fleet and their families.

PC186

Submitted by: Cody Patrick

Community of Residence: Seattle

I have been fishing in the bay for 15+ years. I have faith that the biologists are able to manage the fishery in the best way for all species. I strongly oppose proposals 61 - 68. I believe that these proposals would have great negative consequences to the bristol bay fleet and do not have near enough evidence that they would be effective as intended.

December 29th, 2025



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

RE: Opposition to proposals 61, 62, 69, 92

Dear Chair Carlson-Van Dort,

Petersburg Vessel Owners Association (PVOA) is a mixed gear fleet of vessels that operate in State and Federal fisheries in Alaska and the West Coast. PVOA's members participate in fisheries of all gear types and rely on the sound management of fisheries resources to ensure the viability of their businesses and Petersburg as a community. PVOA has taken position on the following proposals for the January 13th-18th Bristol Bay Finfish meeting.

Proposals 61 and 62:

PVOA Opposes proposals 61 and 62. Both proposals 61 and 62 would remove all sockeye escapement triggers from the Nushagak King Salmon Management Plan before the June 28th date. This is a significant shift from the current management plan that was developed under a Board sanctioned working group that balances the needs of protecting the Nushagak kings and the commercial sockeye harvest. While no plan is perfect, the current plan has a well-designed structure with OEGs and escapement triggers that direct when and how to open commercial fishing time for the drift and set net fleets. A more responsive approach to escape more Chinook is to adjust the OEGs and triggers as opposed to establishing a management plan.

The current management plan has only been in place for three seasons, 2023-2025, while the lifecycle of the Chinook ranges from 4-7 years. The Department has not had an opportunity to assess the true effectiveness of the management plan as no Chinook from the initial brood years have made it back to the river. Creating drastic shifts in management strategy without true cause

will only muddy the waters on effective management for Nushagak kings. The current plan is leading to increased escapement of Chinook up the Nushagak River with a range of 6800-10,500 chinook making it up the river through the three years since implementation.

Proposal 69:

PVOA opposes proposal 69 as written. Proposal 69 uses language from the Nushagak king recovery goal that was drafted but never formalized. Proposal 69 omits language that allows for the Department to relax restrictions and provisions based on escapement data and indices. These omissions would make the proposed recovery plan more dynamic and allow for responsive management to adjust with shifting escapement numbers, allowing the Department to be more agile in their ability to recover the Nushagak kings but also manage a competitive commercial fishery for sockeye. PVOA recognizes the reality of the Nushagak king salmon stock and support a recovery goal plan that takes a more wholistic approach to the needs of the kings and the commercial fishery in the Nushagak District.

PVOA believes that the following provisions on restrictions should be included in any Chinook recovery plan that is developed for the Nushagak:

“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 authority¹.”

These provisions were originally included in the 2023 draft and create more flexibility in the recovery plan and do a more complete job of allowing for flexibility by the Department, as the Nushagak is an incredibly unique river to manage with not only a chinook population but also record setting sockeye returns.

Proposal 92:

PVOA opposes proposal 92. Proposal 92 would restrict late season commercial fishing opportunity in the Naknek-Kvichak District. This proposal would restrict the Department’s ability to manage the Naknek-Kvichak District in a responsive manner to catch and escapement indices. Proposal 92 is also not written in response to a management need that would necessitate the early closure of a commercial fishery that is relied upon by many fishermen to round out their seasons.

¹ ADF&G, Staff comments on commercial, personal use, sport and subsistence regulatory proposals; committee of the whole groups 1-4 for Bristol Bay Finfish (2025)

Thank you for the opportunity to express our positions on proposals for the Bristol Bay Finfish Board of Fisheries Meeting. Please reach out if you have any lingering questions.

Thank you,

Nels Evens,

Executive Director,

Petersburg Vessel Owners Association

Submitted by: Arthur Peterson
Community of Residence: WA

Oppose Proposals 44, 61-68.

Subject: Comments on 2025/2026 Bristol Bay Finfish Proposals

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

My name is Torin Pfundt and I am a drift gillnetter in Bristol Bay. I am writing to share my positions on several critical proposals for the upcoming January meeting.

I strongly **OPPOSE Proposals 61 and 62**. These proposals would remove critical sockeye escapement triggers before the June 28th date. This plan was developed by a sanctioned working group to balance king salmon protection with commercial sockeye harvest.

- **Premature Changes:** The current plan has only been in place for three seasons (2023–2025), while the Chinook life cycle is 4–7 years.
- **Maintain Stability:** Drastic shifts in management before a full generation of fish has returned will only "muddy the waters" regarding the plan's true effectiveness.

I also **OPPOSE Proposal 69 as written**. Any recovery plan must be dynamic and responsive. I support including provisions that allow management restrictions to be relaxed based on real-time escapement data and indices to ensure the Department remains agile in managing both king recovery and a competitive sockeye fishery.

I **OPPOSE Proposal 92**. This proposal would unnecessarily restrict late-season commercial fishing opportunities in the Naknek-Kvichak District. There is no demonstrated management need that justifies closing a fishery that many fishermen rely on to "round out" their seasons. It would also hinder the Department's ability to manage the district responsively based on catch and escapement indices.

I urge the Board to maintain the current management structures that were developed through careful stakeholder collaboration. Thank you for the opportunity to express my positions.

Sincerely,

Torin Pfundt

F/V Buckwild

Submitted by: Ryan Pitcher

Community of Residence: Pocatello, Idaho

Dear Board Members,

I am writing in strong support of Proposal 102, which seeks to achieve a more fair, balanced, and biologically sound management approach for Chinook (king) salmon on the Togiak River. I have guided in Alaska for 23 years, owned a fishing lodge, and devoted my career to responsible stewardship of our fisheries. With Chinook numbers in the Togiak River declining in recent years, I am in full support of well-designed regulatory adjustments that are essential to protecting escapement and ensuring long-term sustainability.

Over the past three years, the sport-fishing sector has carried a large share of the conservation burden for Chinook salmon. We have supported the prohibition on retaining Chinook larger than 20 inches, the gear restrictions, and the ban on bait during the early part of the Chinook run. These regulation changes have significantly reduced sport-fishing impacts on the Togiak River's Chinook. These measures have likely contributed to improved escapement and demonstrate that anglers and guides are willing to do what is necessary for conservation.

However, under the current management structure, commercial and subsistence harvest of Chinook is still permitted, even if incidental or mitigated through gear limits and time-and-area restrictions. While commercial and subsistence regulations do help reduce the take of Chinook through mesh-size limits, net-length restrictions, fishing-period constraints, subsistence fin-clipping requirements, and emergency-order authority; they do not fully eliminate Chinook harvest. The result is an uneven distribution of conservation sacrifice, with the sport-fishing sector carrying a disproportionate share.

For this reason, I support the adjustments outlined in Proposal 102:

1. Allowing bait on the Togiak River beginning July 11 instead of July 16.

This modest five-day shift still protects early-running Chinook while allowing anglers to use prawns to target sockeye slightly earlier. The closure to Chinook harvest has required the sport-fishing community to focus efforts on the retention of other species, specifically sockeye. Historical data show that there are fishable numbers of sockeye in the system by July 11, and sockeye are the primary species of interest during this period. This change would not materially increase pressure on Chinook due to the ongoing prohibition on retaining large kings.

2. Moving the upper boundary for targeting Chinook from the Gechiak River to the Pungokepuk River.

The regulation changes for sport fishermen have significantly reduced sport-fishing impacts on Chinook. The limited entry of commercial operations in the Togiak Wildlife Refuge also restricts guided sport-fishing activity above the Pungokepuk (Pongo). Escapement studies from 2009–2012 indicate that a large percentage of Chinook spawning occurs upstream of the Pongo River. This adjustment therefore improves regulatory clarity, enhances enforcement, and maintains reduced angling pressure in sensitive spawning areas.

Both of these changes are consistent with conservation, improve enforceability, and better balance the management burden among user groups.

As someone with decades of experience on the Togiak River and a long-standing commitment to protecting Alaska's salmon runs, I believe these changes will help maintain the health of the Chinook population while ensuring fairness among the major user groups.

I respectfully urge the Board to adopt Proposal 102.

Thank you for your time and your continued service to Alaska's fisheries.

Regards~

Ryan Pitcher

PC191

Submitted by: Ethan Pitzman

Community of Residence: Homer

I am a bristol bay fisherman from Homer Alaska, and I do not recommend proposal 44 and proposals 61-69.

PC192

Submitted by: Gordon Pitzman

Community of Residence: Homer, Alaska

I vehemently oppose Proposals 44, 61-68. I ask you to please leave the plan unchanged. These proposals would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation. Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility. Thank you!

PC193

Submitted by: Ian Pitzman

Community of Residence: Homer, Alaska

Chairman and members of the Board of Fisheries;

My name is Ian Pitzman, I am a lifelong Alaskan resident and reside in Homer Alaska. I fish in Bristol Bay in the drift fishery and often register in the Nushagak District. I am writing today in opposition to Proposals 44, 61, 62, 63, 64, 65, 66, 67, 68, and 69. All of these proposals seek to change the management plan to the detriment of the sockeye harvest without allowing for time for the effectiveness of the very recent changes made to be understood. How these changes would help Chinook is unclear, but what is clear and evident is that they would have a strong negative effect one of the most significant local economic drivers in the region. I encourage the board to use sound science and methodology in this discussion and take care to avoid overcompensating. I recommend leaving the plan unchanged.

Submitted by: David Quashnick

Community of Residence: Astoria Oregon

I just want to say I am in favor of proposals 75 76 77 78 permit stacking needs to be implemented like it is in other fisheries in Alaska!!

Submitted by: Richard Quashnick

Community of Residence: Naselle Washington

Response to 41 I have personally fished Bristol bay for 40 years now, I know this is a very sore subject, but someone needs to explain to me why the trawl industry is not effected in this problem with king salmon. There bycatch numbers pretty much go unchanged while they talk about closing our seasons down. So maybe someone could explain to our friends to the west and some gillnet fisheries why they are being closed with no effect on the trawl bycatch. There bycatch numbers might be going down and the reason is because there is less to catch. We have seen the trawl industry wipe out our juvenile halibut, now the salmon stocks are at a very concerning level. There hasn't been a directed fishery on kings in at least 15 years which is 3 full cycles. I do appreciate all the board members time, my only hope is that we do something about the bycatch before it's too late. Thank you Rick Quashnick

Submitted by: Neal Quigley

Community of Residence: Washington state

Proposal 102

I am in full support of proposition 102, I have been fishing the Togiak River for a number of years and believe that this Proposal would have no impact on what I have seen as a strong and growing return of all species throughout the system

Thank you for your consideration

Yes on proposition 102.

Submitted by: Joe Radakovich

Community of Residence: West Linn, OR

I am writing to voice my support for Proposal 102 which is scheduled to be discussed at the Jan 2026 meeting

Moving the chinook fishing boundary to the Pongo makes the most sense for law enforcement and anglers. It will help prevent confusion and allow for undisturbed spawning areas for the fish.

Thank you for your time.

Joe Radakovich

Submitted by: Jamison Ramsey

Community of Residence: Ketchikan, AK

I jamison ramsey bristol bay permit holder and boat owner for 30 years oppose proposals 44,61,68 for nushagak district for various reasons

PC199

Submitted by: Tyone Raymond

Community of Residence: Vashon, Washington

Greetings,

My name is Tyone Raymond, and I've been a Bristol Bay drift fisherman since my father started me in 1978. I now run the "Mr Fox", a single engine jet boat that I built in 2012.

I'd like to express my opinion about a few of the proposals.

Proposal # 44.

While I support efforts to limit the harvest of Nushagak Kings, limiting the number of fish kept for personal use by commercial fishermen is not going to change the number taken overall. None of us target Kings for this purpose, and yet there is incidental bycatch that is unavoidable in a gillnet fishery, so I do not support this proposal.

Proposal # 56.

I support keeping the seaward boundary as it is presently as it is, and not allowing it to be based on mean high and low tide, as these allow for more variability. As a drift fisherman trying to keep a legal and reasonable distance from set net gear, anything that brings consistency is helpful.

Proposal # 57

I am against the additional language that forbids explicitly contact with set net gear because in my experience, contact and entanglement is absolutely undesirable from either perspective, and further penalizing what is generally accidental will not solve the issue. It will undoubtedly add further stress to an already stressful situation. The majority of problems of this kind occur when there is a strong onshore wind, and often in the dark when the visibility is poor. There are times when a vessel might lose power, or otherwise have a problem that causes them to drift into set net gear by accident, and adding penalty to this will not help reduce these accidental situations.

proposal # 72

I support a general district for late season for the reasons expressed in the proposal.

Proposals # 75,76,77,78

I support permit stacking in which a single person can own or operate two permits provided the maximum amount of gear per vessel will remain 200 fathoms. I do not support the concept of an "E" permit. By keeping permits separate, it will allow for adjustments in the fleet numbers depending on economic conditions. It can also allow for an important dynamic in which a family member or crew member can enter the fishery using one of the permits, again bringing both vessels to single permit

status. It gives flexibility. Additionally, the point made about the undue burden placed on a "D" permit holder, which is often a crew hand, or family member, is unfair should the operator of the vessel have a violation, should be addressed.

Proposals # 83, 84

I support changing the 32' limit since as stated, the vessels built now are radically different than when the law was enacted. The idea that smaller boats would keep it egalitarian is obviously a thing of the past, since much machinery is crammed into the 32 feet these days, and the competition is ever fiercer. The older, smaller fleet is largely already phased out and sits mainly up on blocks growing weeds.

There are multiple arguments for increasing the length:

A larger platform will be safer in bad weather, and provide more room to work.

It will be easier to focus on various aspects of quality, since there will be more room to place refrigeration machinery, insulation, carry additional water to float fish, etc.

More length will be more efficient in traveling through, or on the water. Building a vessel that maximizes efficiency will be possible, instead of simply adding more horsepower.

Proposal # 81

I support attempt at using another gear type in Bristol Bay, since obviously gill netting while effective, is not great for quality.

Thank you for considering these comments.

Tyone Raymond

F/V Mr Fox



PC200

Submitted by: Michelle Reakoff

Community of Residence: Petersburg

Dear Members of the Alaska Board of Fisheries,

My name is Michelle Reakoff. I am a lifelong Alaskan and a multi-generational Bristol Bay commercial fisherman. My family is from Bristol Bay, and I have spent over 40 years in the region and fishery. I hold both drift and set gillnet permits. I submit the following comments in response to the Bristol Bay Finfish proposals, with positions clearly identified.

My perspective is grounded in the understanding that effective fisheries management must account for more than biology alone. Long-term conservation success depends on maintaining biological sustainability, economic viability, enforceable management, and the political strength necessary to protect the fishery as a public resource.

****Proposal 44 – Subsistence Chinook Limits and Reporting****

****Position: Oppose****

I oppose Proposal 44. Subsistence use is a priority use in Alaska and should not be regulated as a symbolic conservation measure absent clear evidence that it will materially improve escapement outcomes. Without an established Amount Necessary for Subsistence (ANS) for Chinook in the Nushagak, imposing new limits risks increasing social conflict while failing to address the primary drivers of Chinook decline.

Shifting conservation burden onto subsistence users does not strengthen the fishery and risks undermining long-term public support for conservation measures.

****Proposals 61 and 62 – Additional Commercial Restrictions Under Nushagak Chinook SOC Conditions****

****Position: Oppose****

I oppose Proposals 61 and 62. The commercial drift fleet has already absorbed substantial conservation burden through delayed openings, reduced fishing time, and increased enforcement pressure under the existing Stock of Concern framework. Chinook escapement shortfalls have occurred even in years with minimal commercial harvest, indicating that factors beyond fishery interception are influencing stock status.

Further automatic restrictions risk compounding economic harm without providing demonstrable conservation benefit and reduce management flexibility in responding to real-time conditions.

****Proposals 63, 65, 66, 67, and 68 – Expanded or Extended Restrictions Under SOC Conditions****

****Position: Oppose****

I oppose these proposals. Locking additional time, area, or method restrictions into regulation concentrates conservation burden on the most regulated and enforceable user group while offering uncertain additional benefit. Rigid measures reduce the ability to adapt management to tides, weather, and fish behavior, and increase congestion, safety risk, and operating costs for the drift fleet.

****Proposal 64 – Allocation Changes During Chinook Stock of Concern Conditions****

****Position: Oppose****

I oppose Proposal 64. Conservation designations should not be used to restructure allocation among user groups. Allocation changes implemented under Stock of Concern conditions risk becoming permanent precedent unrelated to conservation effectiveness and undermine long-standing access frameworks.

****Permit Stacking Proposals (75–78)****

****Position: Support****

I support permit stacking within a gear group. Permit stacking improves safety, operational efficiency, and economic viability for working fishermen without inherently increasing conservation risk. Given existing time and area limitations, stacking does not equate to proportional increases in harvest, but it does allow permits to remain active and the fleet to remain viable.

****Vessel Specification and Length Proposals (83–85)****

****Position: Support****

I support reasonable modernization of vessel specifications, including vessel length. Modern vessels improve safety, efficiency, and fish quality. Restricting vessel modernization does not protect fish, but it does erode fleet viability and increases costs in an already constrained operating environment.

****Broader Management Considerations****

The commercial drift fleet provides the majority of enforcement accountability, biological data, and economic value that supports Bristol Bay management. As cumulative restrictions continue to concentrate on this fleet, fishing grounds are reduced, operating windows shrink, fuel costs increase, and economic viability declines.

If commercial viability is eroded, pressure does not disappear. It shifts. Access and influence move toward less regulated sectors, enforcement becomes more difficult, and the political capacity to defend Bristol Bay as a valuable public resource weakens. Long-term threats to the fishery do not disappear simply because they are quiet at the moment, and maintaining a strong, valuable commercial fishery is essential to protecting Bristol Bay against future industrial, political, and economic pressures.

Conservation succeeds when the fishery remains biologically healthy *and* economically and politically resilient.

****Closing****

I respectfully urge the Board to evaluate these proposals cumulatively and to avoid further regulatory changes that undermine commercial viability without clear, measurable conservation benefit. Protecting Chinook salmon and protecting the fishery itself are inseparable goals.

Thank you for your consideration.

Respectfully,

****Michelle Reakoff****

Bristol Bay Commercial Permit Holder (Drift & Set Gillnet)

PC201

Submitted by: Avtanom Reutov

Community of Residence: Homer, Alaska

I strongly oppose proposal 44, 61-68.
