PC1

Submitted by: Brad Ackman
Togiak River Lodge, Jordan Larsen CEO
Community of Residence: I live in Kenai, the drainage in question is the Togiak River

Proposal 102, SUPPORT

Dear ADF&G,

The Togiak River is obviously governed by the State of Alaska. However, the REAL "care takers" of the river are the owners and staff of Togiak River Lodge. Jordan Larsen and his crew have been caring for the Togiak River watershed and its fisheries for years in a professional, consistent, and dedicated way and the river is FAR BETTER for their efforts. I've been fishing the Togiak since well before the Larsen era and while the fishing was always great, all sorts of "harvest" practices were taking place that would make your skin crawl. That nonsense has ceased, thanks to the diligence of the Larsens. They are a fabulous steward of the resource. I am largely a fly fisherman for silvers, so Proposal 102 would not affect me in a significant way. However, I can state with complete certainty that if the Larsens are proposing a modification to regulations, their proposal has been well thought-out, thoroughly examined, and will benefit the river, the fish, and the anglers.

I appreciate your time,

Brad Ackman, Kenai

PC2

Submitted by: Dan Agen
Community of Residence: Washington

Proposal 70 support , it's long over due

Proposal 72 support

Proposal 73 support

Proposal 75 support

Proposal 76 support

Proposal 44 oppose

Proposal 61-69 oppose

PC3

Submitted by: Emily Agen
Community of Residence: Washington

Proposal 70, support its long overdue proposal 72 support

proposal 73 support

proposal 75 support

Proposal 76 support

proposal 44 oppose

proposal 61 through 69 oppose

PC4

Submitted by: Karen Agen
Community of Residence: Washington

Proposal 70 support, it’s long overdue

Proposal 72 support

Proposal 73 support

Proposal 75 support

Proposal 76 support

Proposal 44 oppose

Proposal 61–69 oppose

Gerald Ball, President and Owner
P.O. Box 542 • Dillingham, AK 99576 (907) 842-5060 • Fax (907) 842-4231
fwa@ak.net

December 29, 2025

Chair Märit Carlson-Van Dort
Alaska Board of Fisheries

RE: Proposal #65
Comments and Suggested Modifications

Chair Carlson-Van Dort:

Alaska's Best Seafood (ABS) is a salmon processing company located on the northern end of Ekuk Beach in Bristol Bay, and is Alaskan owned by a third-generation Dillingham Alaskan family. My family's processing facility provides a market for 103 salmon set gillnet permit holders that fish on Ekuk Beach in the Nushagak District. Approximately two-thirds of these fishermen are local watershed residents or reside elsewhere in Alaska. Traditional set gillnet harvesting on Ekuk Beach, which goes back more than five generations, is conducted utilizing trucks and tractors, rather than skiffs.

The purpose of Proposal #65 is designed to address the Nushagak District Allocation Plan (5 AAC 06.367) for sockeye salmon between drift gillnet and set gillnet fisheries which was created by the Alaska Board of Fisheries in the 1990's. An intent established by the board states in 5 AAC 06.355 (b), *"It is the intent of the Board of Fisheries (board) that Bristol Bay sockeye salmon be harvested in traditional harvest locations...,"* and (d) (3), *"distribute fish within individual districts and subdistricts through the spacing and duration of openings."*

The proposal has two parts; address a better way to achieve the goals of the allocation plan and to not include the Wood River Special Harvest Area (WRSHA) from the calculations in managing for the allocation between set and drift.

In recent years the allocation has not been achieved and the Nushagak setnet harvesters have lost 6.1% from the adopted 26% in the Allocation Plan. This represents a 23% loss of harvest

share. This is due in large part to the increased by drift gillnet effort, many of which have significantly upgraded their vessels to become much more efficient. Additionally, the accuracy and confidence of the Port Moller Test Fishery allow a determination for when and where to concentrate their efforts.

Data from the Bristol Bay Science and Research Institute's "Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan" has shown that even with increased vessel effort by the drift fleet, setnet fishing time has decreased disproportionately. From 2023 to 2025, fishing through July 5th has resulted in a reduction of around 37% fishing time in the drift gillnet fleet, while the setnet fleet has had their time reduced by 46%.

The management for harvest over the last five years has had unintended consequences for the set gillnet harvesters in the Nushagak District, with the Allocation Plan being placed on a lower priority when confronted with possible foregone harvest. This has resulted in significant changes in management style over the last five years and has created more of a "line fishery" with more drift effort on the southern boundary line, and even more so in the last three years. The consequence has been the restriction in the ability for salmon to enter into and distribute within the full Nushagak District.

Allocation Plan Based on Management of Chinook Conservation :

We recognize that the prescriptive language placed in proposal 65 to better achieve the allocation. After discussions with industry and the department, we feel other options merit consideration.

These ideas do not change the King Salmon Stock of Concern Management Plan but could provide a way to achieve the goals of the Allocation Plan between set and drift gillnet harvesters. We believe they would also provide benefit in the efforts to decrease Chinook harvest.

1. In the early part of the season, modify the drift fleet's opening time. Consider opening the drift fleet at high water, instead of an hour or two before high water. This would accomplish two things. Salmon would have more time to move into and throughout the district and the setnet harvesters would have time to harvest sockeye before the drift fleet begins fishing and cuts off access. This simple action could help with the allocation disparity. This would also allow Chinook more time to migrate through the district during the flood tide.

2. In the early part of the season restrict the drift fishery from low tide fishing, as is the case in the Naknek-Kvichak District. This would allow sockeye to begin their movement into the district without being harvested on the southern line, while also providing protection for Chinook traveling in the deeper water of the channels.

Wood River Special Harvest Area:

Our small processing operation depends on deliveries of sockeye from the Ekuk harvesters in order to stay in business and by including the WRSHA in the allocation calculations, our business is being harmed. We believe the WRSHA harvest should not be counted in the allocation between drift and set gillnetters in the Nushagak District. Shown below are some reasons for this recommendation:

1. When the Allocation Plan was adopted, the WRSHA was not included in the historical distribution between drift and setnet harvesters. The WRSHA was not officially part of the Nushagak District until 2018.

2. As stated earlier, the setnetters on Ekuk Beach fish with vehicles, rather than skiffs, and have no access to the WRSHA. This does not provide equal opportunity and can be considered allocative within the set gillnet fleet.

3. In recent years, the WRSHA opens very early and has resulted in much larger harvest which affects the allocation to a greater extent and is an unintended consequence.

Ekuk beach harvesters rely on our small shore-based Alaskan processor located at the historic Ekuk facility, that has been in operation for over 100 years, to purchase their sockeye salmon and provide a high-quality product. This is the last independent, and locally owned and supported, processing facility in Bristol Bay.

Without a plan to achieve the long-standing allocation between setnet and drift gillnet harvesters, the viability of our processing operation is being put at risk. This would be a devasting loss to the Bristol Bay community. Without a market, the many harvesters, their families and crew would not be able to prosecute this traditional fishery.

We are asking the Board of Fisheries to help us by providing direction to the department on ways to manage the allocation and keep the setnet fleet and our processing operation sustainable.

Thank you for your consideration.

Gerald Ball
President and Owner

PC6

Submitted by: Travis Allsup
Community of Residence: Togiak river lodge

I support proposal 102, as a sport fisherman and guide on the Togiak we have little to no impact on king salmon using bait a week earlier but would allow us to target sockeye in different ways earlier in the season that doesn't require flossing depending on water levels. With many different user groups on the river, moving the chinook deadline up to the mouth of the pongo would allow everybody to spread out more and give better opportunities for all.

Tav Ammu, Dillingham, Owner/operator of F/V Sea La Vie

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

- **Oppose** - This is an attempt by an outside sport fishing business to increase their ability to make money at the expense of subsistence fishermen from the area.

48 Modify the fishing period ratio between the set gillnet and drift gillnet gear groups, and change the distance in which gear associated with set gillnet fishing must be removed in the Kvichak River Special Harvest Area

- **Oppose** - Unrealistic efforts to get setnet equipment out of the way so he can catch more. Confusing wording and conflating separate issues.

51 Allow extra drift gillnet to be carried on board the vessel in the Kvichak River Special Harvest Area,

- **Oppose** - Increase opportunities for illegal fishing by “solving” a problem that doesn’t exist.

54 Repeal the Nushagak River Coho Salmon Management Plan

- **Support** - Seems like a similar proposal as 55 with more words

55 Repeal the Nushagak River Coho Salmon Management Plan

- **Support** - Seems like a similar proposal as 54 with less words

56 Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery

- **Support** -

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

- **Support**

59 Ensure drift gillnet fishing opportunity in the Wood River Special Harvest Area, regardless of allocation

- **Oppose** - Proposal is not based on equity but on wanting to catch more for self.

60 Increase the length of a set gillnet in the Wood River Special Harvest Area

- **Oppose** - Proposal is not based on equity but on wanting to catch more for those in the prime locations (first few spots) and decrease potential sharing of resources

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

- **Oppose** - We have only one cycle of the King Salmon Management plan, which is less than one generation of a chinook salmon. More time is needed to understand if it is having an impact or not.

62 Prohibit commercial fishing in the Nushagak District until June 28 or until the minimum escapement goal of 55,000 king salmon are counted at the Portage Creek sonar

- **Oppose** - Proposal is meant to increase king salmon fishing opportunity for sport fishing lodges to take money and resources away from local fishers. Same attempt as his first proposal, 42.

63 Amend the Nushagak District King Salmon Stock of Concern Management Plan

Support - This does not change the King Salmon Stock of Concern Management Plan besides putting more restrictions and regulations on sport fishers (90% nonresident) to share the burden of revitalizing the King Salmon population

64 Open the Wood River Special Harvest Area to drift and set gillnet gear until one of the king salmon stock of concern triggers is met

- **Oppose** - We have only one cycle of the King Salmon Management plan, which is less than one generation of a chinook salmon. More time is needed to understand if it is having an impact or not.

69 Adopt recovery goal for Nushagak River King Salmon as recommended in the Department's Status and Action Plan report

- **Oppose** - We have only one cycle of the King Salmon Management plan, which is less than one generation of a chinook salmon. More time is needed to understand if it is having an impact or not.

70 Extend the northern boundary in the Ugashik District

- **Support**

75 Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery

- **Oppose** - Bristol Bay has seen substantial permit migration, economic migration, and crewmember migration. Permit stacking will exacerbate the problem, increase the cost of entry, consolidate resources to those who already have a substantial amount, and discourage future local participation in the fishery. It's an excuse for the rich to get richer and hoard resources. If anything the board should vote in the other direction and only allow a boat to run as a "D" boat for two consecutive seasons before requiring that "D" permit to fish on another boat. This would encourage broader knowledge and training, decreased wealth consolidation, and potentially increase opportunities for those interested in getting into the industry to do so.

76 Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery

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80 Allow joint venture set gillnet fishing operations in Bristol Bay

- **Support with amendments** - I like this idea but I think there is opportunity for abuse. We must re-write this proposal so that abuse and misuse is not possible.

81 Allow the use of stationary, non-entanglement nets to harvest salmon in the Bristol Bay Management Area

- **Oppose** -

82 Amend multiple vessel specifications and adopt additional vessel specifications

- **Support**

83 Extend the overall length of a vessel registered for salmon net fishing in Bristol Bay, and modify multiple vessel specifications

- **Oppose**

84 Increase the overall length of vessels registered for salmon net fishing in Bristol Bay

- **Oppose**

85 Remove vessel length and include in a separate regulation

- **Support**

87 Define refrigerated seawater transom cooler and include in vessel specification and operations

- **Oppose**

88 Remove anchor roller specifications
- **Oppose**

89 Increase the allowable size of an anchor roller
- **Oppose**

Support	**Oppose**
54	44
55	48
56	51
57	59
63	60
70	61
80 - Support with amendments	62
82	64
85	69
	75
	76
	77
	78
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	84
	87
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	89

Comments of Bristol Bay Proposals January 2026

Stosh Anderson, Kodiak Alaska

I have fished in Bristol Bay for 50 seasons.

Proposal 53: I do not support this proposal; this will only further disadvantage fishermen in the district by making it more crowded and put the drift fleet closer to the setnet fishermen. This will not accomplish the stated objective to reduce out of district fishing.

Proposal 56: The regulation had a sunset date when adopted; the sunset was put in place so the gillnet boundary could be evaluated as reflecting historical positioning. From my observation it appears to conform to historical positioning. I support removing the sunset provision.

Proposal 71: I support a general district after the 17th of July (end of EO period). Without enforcement presence a subset of the fleet fishing out of the district has been documented. The balance of the fleet that chooses to fish in district is significantly disadvantaged. This is the short-term effect but, in my opinion, not the most important long-term result. The crewman on both the in and out of district participating vessels see and normalize this behavior. What the system is fostering by example is future skippers fishing over the line through out the season. A general district is no panacea but a step in the right direction to providing an orderly fishery. As a note: Protection can't allocate its limited resources to the fishery after escapement have been reached. It is the State's primary responsibility to the sustainability of the resource.

Proposal 75-78: I support stacking of drift permits. In an attempt to achieve and optimum number and subsequent fleet reduction, stacking is more equitable than a buyback program. In a buyback program all permit holders are assessed to fund the buyback. Whit a stacking scenario permit holders can choose to fund the reduction or not.

Proposal 80: I support setnet fishermen be able to comingle their fish for delivery. This makes sense on the beach or in skiffs. ADF&G can calculate the CPUE so there is limited management impact.

Proposal 85: I support this proposal. The vessels have evolved in the fishery both in propulsion and refrigeration. This proposal addressed the issue without increasing floatation and planning surface within the 32 ft limit. By defining an area aft of transom for various items to be placed, rather than trying to define all the possible apparatus, allows for innovation and ease of enforcement. As stated in Proposal 90; requests 30 inches for stern rollers aft of transom that are currently legal needs to be considered. Any change in the regulation should not make any currently legal portion of the vessel illegal with regulation change.

PC9

Submitted by: John Arnestad
F/V T &T
Community of Residence: Washington

My name is John Arnestad and I've been a Bristol Bay Fisherman in Alaska for 40 years. 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.

PC10

Submitted by: Lucas Arnestad
Salvaje Fisheries, LLC
Community of Residence: Washington

Opposing proposals 44, 61-68 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.

PC11

Submitted by: Alfred Attwood
Community of Residence: Olympia, Washington

I support the proposal 102. I believe that being able to use bait to target sockeye July 11 th instead of the 16th would let you use bait a few more days to catch sockeye. I agree moving the boundaries Geciak River to the Pongo river for Kings it makes sense.

Madam Chair and Members of the Board,

My name is Christina Ball. I am permit holder and owner of a multi generational family set net operation on Ekuk Beach in the Nushigak District. I have been fishing Ekuk Beach off and on since 1997 and have raised my children to fish so the legacy may continue. I submit this comment as an individual whose family's livelihood depends on a safe, fair, and sustainable Bristol Bay fishery. I believe that the proposals that my family and fellow Ekuk Beach fishers have written and support as a collective will add great value to helping keep Bristol Bay sustainable into the future and for generations to come.

Support for Proposal 56:
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 this boundary permanent provides certainty for set net placement, safe drift operations, and an enforcement effort in a high density fishing environment. I believe this Proposal will help greatly on both sides of this line both in safety for all fishermen involved and protection for both set net and drift gill net gear.

Support for Proposal 57:
I support Proposal 57, which establishes the same boundary as the shoreward limit for drift gill net gear and prohibits contact with set gill net gear. This proposal reduces entanglement risk which leads to 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 in the Nushigak District these clear and enforceable rules are essential to maintaining an orderly and safe fishery. My family and I as well as countless other set netters on Ekuk Beach have been affected greatly by drift boats and their gear interfering with our set net gear over the years that have caused countless economic losses and in some cases led to some set netters losing nearly the entire fishing season based on tidal constraints to reset our set net gear.

Support for Proposal 65:
I support Proposal 65, which will help reestablish the Board adopted 26% set net allocation that has not been met by ADF&G for many years leading a disproportionate economic burden on Ekuk Beach fishers. My family and I as well as our entire set net fleet and our shoreside processor have been severely negatively affected by the failure to achieve even close to our allocation by more recent failed efforts by ADF&G. I believe this proposal will aid greatly in helping Ekuk Beach and other Nushigak set netters as well as watershed communities in the Nushigak getting back to where we once were and treated in a fair economic manner.

Support for Proposal 80:
I support Proposal 80, which allows limited joint venture set net operations under defined conditions. Joint ventures help small family based operations adapt to short openings, rising costs and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully for decades in the Kodiak set net fisheries for over 40 years.

These requests I believe are crucial to sustaining the legacy fishing operations on Ekuk Beach. For over 100 years Ekuk has harvested some of the best salmon in the Bay and it is up to us to ensure that future generations continue to have the same opportunities we have had.
I appreciate your consideration and your time in these matters.

Sincere Regards,
Christina Ball

Madam Chair and Members of the Board,

My name is Gavin Ball. I am permit holder and part of a multi generational family set net operation on Ekuk Beach in the Nushigak District. I have been fishing Ekuk Beach for nearly a decade as a fourth generation set netter. I submit this comment as an individual whose family's livelihood depends on a safe, fair, and sustainable Bristol Bay fishery. I believe that the proposals that my family and fellow Ekuk Beach fishers have written and support as a collective will add great value to helping keep Bristol Bay sustainable into the future and for generations to come.

Support for Proposal 56:
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Support for Proposal 65:
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Support for Proposal 80:
I support Proposal 80, which allows limited joint venture set net operations under defined conditions. Joint ventures help small family based operations adapt to short openings, rising costs and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully for decades in the Kodiak set net fisheries for over 40 years.

These requests I believe are crucial to sustaining the legacy fishing operations on Ekuk Beach. I have been raised to continue in the heritage my father and forefathers started and believe that Ekuk and that future needs protection moving forward. I appreciate your time and effort as you carefully consider these proposals.

Sincere Regards,
Gavin Ball

EBFA Member Public Comment Template

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Hilde Ball, and I am a set-net crew member in my family's fishing operation, where we fish 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. I have spent my entire life fishing in Ekuk and living in the communities of Bristol Bay, where my family has lived for six generations. I support the following proposals, outlined below, that EBFA has also written in support of. This is because I have seen first-hand how detrimental poor Chinook management, lack of an official and enforced offshore set-net boundary, and allocation can be to set-net fishing communities like my own. Therefore, I believe that these proposals will benefit not only set-net fishermen like myself, but also the Bristol Bay fishery as a whole.

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,
Hilde Ball
Ekuk Beach, Nushagak District

Madam Chair and Members of the Board,

My name is Jason Ball. I am an owner operator of a multi generational family set net operation on Ekuk Beach in the Nushigak District. I have been fishing Ekuk Beach for decades as my father and his father did before him. I submit this comment as an individual whose family's livelihood depends on a safe, fair, and sustainable Bristol Bay fishery. I believe that the proposals that my family and fellow Ekuk Beach fishers have written and support as a collective will add great value to helping keep Bristol Bay sustainable into the future and for generations to come.

Support for Proposal 56:
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 this boundary permanent provides certainty for set net placement, safe drift operations, and an enforcement effort in a high density fishing environment. I believe this Proposal will help greatly on both sides of this line both in safety for all fishermen involved and protection for both set net and drift gill net gear.

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Support for Proposal 80:
I support Proposal 80, which allows limited joint venture set net operations under defined conditions. Joint ventures help small family based operations adapt to short openings, rising costs and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully for decades in the Kodiak set net fisheries for over 40 years.

These requests are important steps to towards fair and equitable harvest share as well as common sense approaches to more effective and safe management for the Nushigak District. I appreciate your consideration and your time in these matters as well as the Board's dedication to our Great state and its fisheries.

Sincere Regards,
Jason Ball

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Logan Ball, and I am a set net permit holder 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. We have not given the plan time to see if it effective and disrupting it now would skew any data we would gather on its effectiveness. I believe we should at the very least let the plan go through a whole chinook life cycle of 7 years before any decisions are made regarding the plan and changes that might be made to it. 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. In the past my family has had many instances where boats have cut our lines and we will loose out on several tides, if not several days or weeks, of fishing time and there is little enforcement on this. Even when we have taken pictures and videos of this happening, those boats rarely get tickets, and there is no compensation for us and our lost fishing time. We are not able to reset our gear unless the tide is low enough for us to reach our screw anchors out in the water. So sometimes that means we are down for a tide and other times that means we are down for days or weeks. I believe that this proposal would help to put protections in place for set net sites and help law enforcement to be able to enforce those protections.

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,
Logan Ball
Ekuk Beach, Nushagak District

PC17

Submitted by: Samantha Barnes
Community of Residence: Naknek

Having family who make their living from fishing in Bristol Bay, I strongly disagree with proposal 61 as it has major negative impact on my family and all other Bristol Bay fisherman who rely on this fishery to make a living for themselves and their families. I believe our biologists have the ability to manage this fishery properly as they have for years. This proposal takes it out of the biologists hands completely, and will cause severe negative impact to the future of the sockeye salmon run in the Nushigak district.

PC18

Submitted by: Boris Basargin
Community of Residence: Homer

I'm opposing the Nushagak king salmon plan. Proposal 61 and a few more. Of those Proposals are adopted. We're losing our whole livelihood. And I believe of what i experienced in Bristol Bay since early 90's. It is not the Commercial gillnetters that are the Cause of the Kingsalmon population.

So please Consider Reevaluating these. And hopefully go back to the management plans we had before.

We used to start Nushagak fishing once 100k sockeye passed now , 3mil.

PC19

Submitted by: Daniel Basargin
Community of Residence: Homer

I oppose proposals 41 and 61-68. I ask the board to leave the management plan unchanged. INTERCEPTED Chinook numbers must be studied in the Bering Sea as it is not only Nushugak Chinook struggling.

PC20

Submitted by: Ivan F Basargin
Community of Residence: Homer, Alaska

The proposals 44, 61 through 68 needs to be left unchanged, the current management plan has not been in place long enough to evaluate the chinook salmon plan, 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.

BECHAROF CORPORATION

Our People ● Our Culture ● Our Prosperity

December 26, 2025

Subject: Opposition to Proposal #52

To the Alaska Board of Fisheries,

Becharof Corporation respectfully submits these comments in opposition to Proposal #52, which seeks to establish an "Upper Egegik River Sockeye Salmon Special Harvest Area." Becharof Corporation is the private landowner of a substantial portion of the river corridor and adjacent lands located entirely within the proposed harvest area, and therefore has a direct and significant interest in the impacts of this proposal.

Our opposition is based on the following concerns:

- **Trespass Issues:** Establishing a commercial harvest area over privately owned lands would significantly increase trespass incidents by both set and drift gillnet fishermen. Managing and responding to trespass complaints would place an undue burden on the landowner and enforcement agencies.
- **Shoreline Erosion:** The proposed area includes sections of river that are naturally narrow and environmentally sensitive. Increased fishing pressure, vessel traffic, and shore anchoring associated with set net gear would accelerate shoreline erosion, destabilize riverbanks, and cause long-term habitat degradation.
- **Law Enforcement Challenges:** Alaska State Troopers are already short-staffed, and this remote area would be difficult to patrol effectively. Enforcement would be challenging not only for fisheries regulations, but also for addressing trespass issues on private land.
- **Lack of Tender Accessibility:** The proposed harvest area is not accessible for tenders to safely and efficiently receive fish. This limitation would create logistical inefficiencies and could result in unsafe practices or delayed fish deliveries.
- **Safety Concerns:** This section of the river is shallow, complex, and difficult to navigate, effectively limiting safe operation to jet boats. In the event of an accident or emergency, the area would be difficult to access for search, rescue, or medical response.
- **Precedent and Landowner Impacts:** Approval of this proposal would establish a troubling precedent for expanding commercial fishing effort into remote, privately owned river corridors without adequate consideration of landowner rights, enforcement

PO Box 220029 ● Anchorage, AK 99522 ● BecharofCorp @gmail.com

feasibility, safety concerns, or conservation risk. Such precedent could encourage similar proposals elsewhere, compounding these issues across other private land holdings.

- **Risk to Discrete Fish Runs:** The Egegik River / Becharof Watershed Navigability Report (1996) identifies **Swampy River**, located entirely within the proposed harvest area, as a navigable channel. Due to its narrow mouth, nets could easily span the full width of this channel even with reduced net length restrictions in place, creating a high risk of intercepting and negatively impacting an entire discrete salmon run. Additionally, the overall narrowing of the Upper Egegik River and its associated channels would concentrate fishing effort in confined corridors, increasing the likelihood of disproportionate interception of upstream-bound discrete stocks. **Under these conditions, the proposal fails to demonstrate that conservation and sustained yield objectives can be reliably met.**

For these reasons, Becharof Corporation believes Proposal #52 presents unacceptable risks to private property rights, fish habitat, public safety, and the long-term sustainability of salmon resources. **The proposal does not demonstrate a clear biological or management need that cannot be addressed through existing commercial harvest areas**, and we respectfully request that the Board of Fisheries reject Proposal #52.

Respectfully submitted,

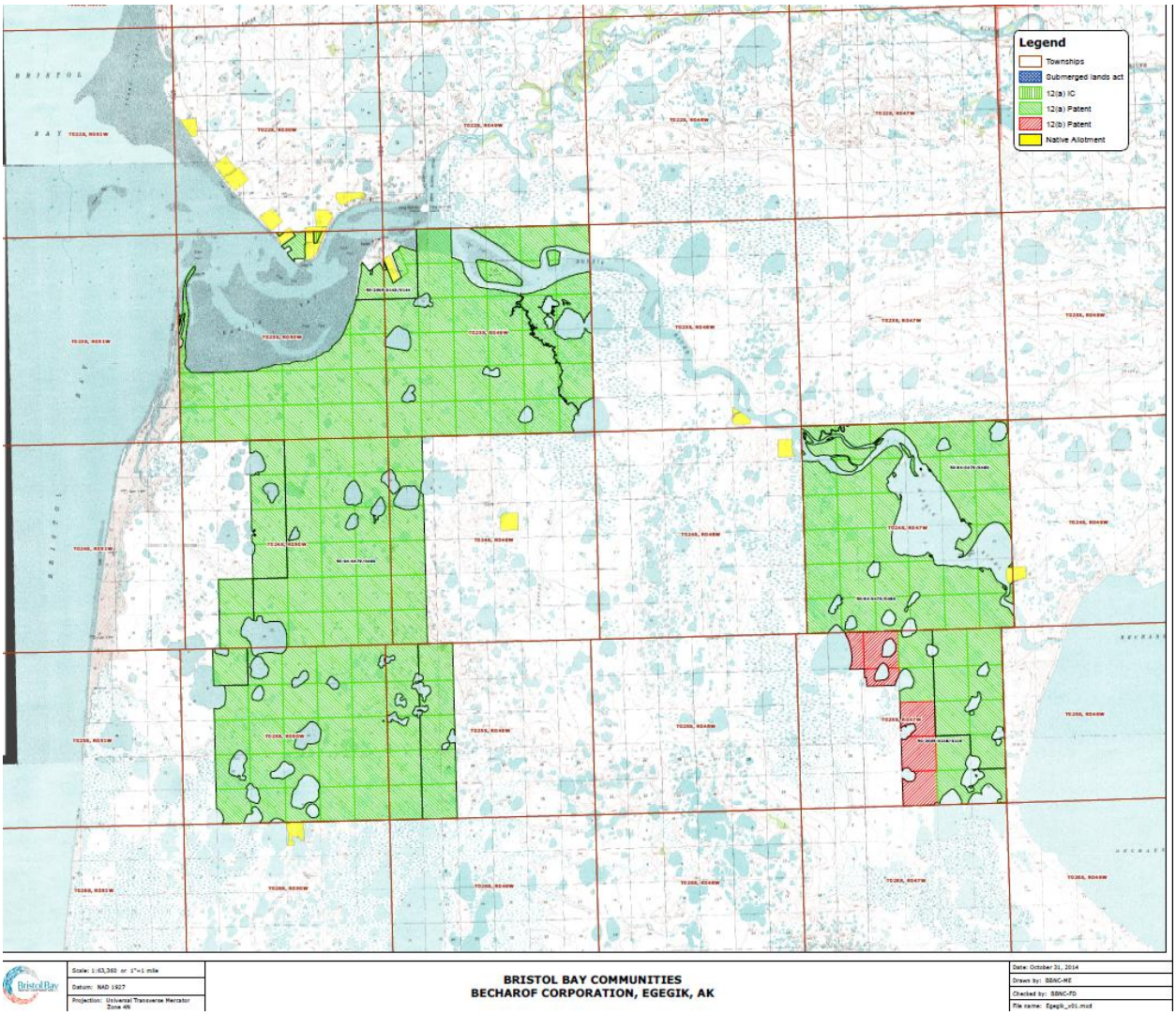
Derek Bennett

Derek Bennett
President
Becharof Corporation
On behalf of the Board of Directors

Private Landowner within the Proposed Upper Egegik River Area

Attached: Exhibit 1 - Becharof Corp land holdings map

Exhibit 1 – Becharof Corporation Land Holdings



PC22

Submitted by: Stanley Beebe
Community of Residence: Out of state

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Stanley Beebe. 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,

Stanley Beebe

PC23

Submitted by: Jaymi Bethea
Community of Residence: Out of State

I am against management plan updates to the Nushagak district, that are based on rigid date based methods. I am against the proposals #61,62, and 69. To restrict the commercial fishery openers based on king escapement any further risks damaging the ecosystem and return of all salmon if there is a large over escapement during the time commercial fishing is closed in the Nushagak early season. This would defeat the intention of these proposals and would damage every fishing outfitter sport and commercial.

I support stacking permits, and being able to fish a duel permit with a sole permits holder.

PC24

Submitted by: George Bishop
Community of Residence: Homer, Alaska

I have fished consistently in Bristal Bay as a set netter since 1980 along with my family. Proposal #80 would keep all of my family members in legal status while selling multiple family member caught fish.

December 29, 2025

To Whom It May Concern:

My name is Toby Bloom and I have been a fisherman in Bristol Bay since my first season crewing in 2008. In 2023 I purchased a drift boat and a permit and have enjoyed running my own operation for the past few years. Although I have spent time fishing in all five districts, the Nushagak district is often an important part of each season. The longevity and sustainability of the Bristol Bay fishery have always been important to me, but both have become even more of a priority as I've invested in the fishery.

After reviewing the Board of Fish proposals for 2026, I'm concerned that several proposals – particularly those related to the 2023 Nushagak King Salmon Stock of Concern Management Plan (Proposals 44 and 61-69) – may be premature and potentially distracting from ongoing conservation efforts. I understand that the 2023 Plan represents a well-informed, data-driven, and collaborative approach to king conservation in the Nushagak district with support from commercial, sport, and subsistence fishermen, as well as regulatory and research bodies.

The first few years under this plan have shown promising signs, with increased escapement numbers during peak king runs and broad acceptance of reduced fishing time in the name of conservation. However, we still have not observed a full life cycle for the generation of kings hatched in 2023. Given the four- to seven-year lifespan of a king salmon, more time is needed before meaningful conclusions can be drawn about the current plan's effectiveness. If the current plan was in critical need of revision, then I could see a need for intervention at this point. But given the promising signs so far, it seems prudent to limit modifications and stay the course such that the 2023 plan can be thoroughly assessed once enough time has passed.

I ask that the Board allow the 2023 Management Plan to play out over a full generation of king salmon, unmodified, such that it can be properly evaluated after an appropriate period of time has passed.

Toby Bloom

[redacted]

PC26

Submitted by: Joseph Boenish
boenish fisheries llc
Community of Residence: Naknek

44, 61-68

Corey Boone
[redacted]
Missoula, MT 59808
[redacted]
F/V Emmie Lu

Alaska Board of Fisheries,

I am writing in support of permit stacking, proposals 75 and 76. Please read, as permit stacking will have a positive benefit to king salmon survival, as well as other items of concern.

My name is Corey Boone (43), I am a commercial fisherman in Bristol Bay. I own my own vessel (14 years), direct market my catch, and advocate for our fishery. I am currently a non-resident of Alaska, and I reside in Missoula, MT. However, I spent the first 22 years of my life living in Homer, AK while assisting my father for some of his 25 years in the Bristol Bay fishery.

My goal in writing to you is to present information supporting the ability of individuals to stack their fishing permits, ie. one individual can fish two permits at the same time from one vessel, D vessel.

The Bristol Bay fishery is composed of many different individuals from many different backgrounds and geographical areas that converge each year to harvest sockeye from the five main districts of Bristol Bay. Each individual has their own story that has landed them in a position to own their limited entry permit for the Bristol Bay fishery.

This limited entry permit gives each person equal opportunity to harvest salmon from the waters of Bristol Bay. The fishery offers a level platform for individuals to pursue their goals. It is up to each individual permit holder to determine the scope of their involvement in the fishery, and to determine the level of productivity they strive to achieve.

The two main goals of fisherwomen and fishermen involved in the Bristol Bay fishery are the sustainability of the fishery and profitability from the harvest.

The sustainability of the fishery falls into the hands of the professionals in Alaska's Department of Fish and Game. They are competent at what they do and we defer to them to manage the fishery to their best capabilities while assisting in any way possible.

The focus of sustainability is currently surrounding king salmon numbers. Permit stacking will reduce gear in the water and help increase survival and escapement for king salmon.

The profitability for each individual permit holder is tied to their fishing style, decision making, equipment maintenance, crew management, hiring practices, gear management, etc.

The option for permit holders to fish two permits at the same time directly correlates to every permit holder's increased profitability in the fishery and allows for increased king salmon survival and escapement. Details below.

1 permit = 150 fathoms of fishable gillnet gear

2 permits registered to separate vessels = 300 fathoms of gillnet being fished

2 permits registered to the same vessel = 200 fathoms of gillnet being fished (D vessel)

*Each registered D vessel removes 100 fathoms of gillnet gear from the Bristol Bay fishing waters. 100 fathoms = 600 feet, 10 new D boats equates to over 1 mile of gillnet gear removed from the fishery, 100 new D boats equates to over 10 miles of gillnet gear removed from the fishery.

The benefits of increased D vessels fishing in Bristol Bay are as follows:

I. Potential for larger volumes of king salmon escapement due to reduced fishing gear in the water.
    A. King salmon conservation is top of mind for all involved in the Bristol Bay fishery. Permit stacking will reduce gear in the water and allow for increased king salmon survival and escapement.
II. Increased profitability for all vessels.
    A. Less gear in the water equates to larger possible catch volumes per fishing vessel.
    B. Lowers the risk of failed financial seasons on low volume years.
III. Less aggressive fishing practices on boundary lines.
    A. Decreased vessel traffic on fishing lines leads to reduced on-water conflicts, vessel collisions, enforcement strain, and fishery stress.
IV. Fewer conflicts between set-netters and gillnetters.
    A. In-river and shallow water vessel numbers would be decreased resulting in fewer instances of gear entanglement and could lead to an improved relationship between the two gear groups.

The ability of permit holders for the Bristol Bay fishery to fish two permits at once, D vessel, will benefit the entire fleet and the future of Bristol Bay salmon.

Thank you for your time and consideration.

Sincerely,

Corey Boone

PC28

Submitted by: Dylan Borden-Deal
Community of Residence: Seattle Washington

My name is Dylan Borden-Deal and I am a Bristol Bay drift net permit holder, and boat owner with 18 years of fishing experience in Bristol bay.

I would like to voice my strong OPPOSITION to proposal 44 as well as proposals 61-69.

The Nushagak King Salmon Management Plan, adopted in 2023, hasn't been in place long enough to asses a full age-class of King salmon. Therefore the management plan should not be altered at this time.

PC29

Submitted by: Rowan Borden-Deal
Community of Residence: Cordova AK

Hello I'm Rowan Borden-Deal owner operator f/v Luna Mar and Bristol Bay Drift permit holder. I have fished Bristol Bay and specifically the nushigak every season since 2003. When I arrived there was still a commercial fishery for king salmon. I have watched over 20 years as these stocks dwindled. I am strongly in favor of a management strategy that helps preserve king salmon. These proposals undermine years of experience and a comprehensive management plan that is already in place. To change the plan now before even one full king salmon life cycle has taken place would be negligent and short cited. We need management that's has a steady hand not reactionary and sporadic strategy. I adamantly oppose proposal 44, and 61-68.

PC30

Submitted by: Chris Braun
Sustainable fisherman
Community of Residence: Kenai

I oppose Proposal 44 restrictions on the Bristol Bay directed sockeye salmon fishery.

Delaying or limiting sockeye management until after June 28 would waste management efforts and Alaska resources, doing little to protect future runs.

The primary threat remains Bering Sea trawlers—the only fishery without meaningful Chinook (king) salmon bycatch restrictions. These unsustainable vessels intercept significant numbers of Bristol Bay-bound kings year-round as prohibited species catch.

Restricting sustainable in-river drift and set net fisheries before controlling federal ocean trawl bycatch is ineffective. True conservation must prioritize the largest impacts first.

Bristol Bay Fishermen's Association
P.O. Box 60131
Seattle, WA 98160
Phone (206) 542-3930
bbfa@seanet.com
www.bristolbayfishermen.org

Date: December 29, 2025

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section

The **Bristol Bay Fishermen's Association** (BBFA) submits the following positions and comments on proposals for the Bristol Bay Finfish Board of Fisheries Meeting.

BBFA represents permitholders who fish for salmon in Bristol Bay. Our mission is to protect the renewable salmon resource and promote economic sustainability for commercial salmon permit holders in Bristol Bay.

Thank you for the opportunity to provide comments on these proposals.

Sincerely,

Luke Peterson
President

BBFA's Bristol Bay Board of Fisheries Proposals Positions/Comments

Subsistence
Proposal 44: Oppose (see BBFA comments on Proposals 61-69.)

Eastside Management
Proposals 45-47: Oppose

Proposals 48-51: Oppose: Do not make changes to the Kvichak River Sockeye Salmon Special Harvest Area Management Plan. There is no basis to change management of a plan for a fishery that has not occurred yet.

Proposal 52: Neutral

Proposal 53: Oppose

Westside Management
Proposal 54: Support

Proposal 55: Support

Proposal 56: Neutral

Proposal 57: Oppose

Proposals 58-60: Neutral

Nushagak District King Salmon Stock of Concern Management Plan
Proposals 61-69: Opposed
The Bristol Bay Fishermen's Association asks the Board of Fisheries to leave the Nushagak District King Salmon Stock of Concern Management Plan unchanged. Proposals 44 and 61-69 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.

If passed, these proposals could lead to a loss of harvest of 7 million sockeye for the commercial fishing fleet in the Nushagak. For example, **Proposal 61 could close the sockeye fishery until June 28th, and becomes a non-seasonal mandate usurping AGF&G's authority.**

Fishing Districts
Proposal 70: Neutral

Proposals 71-74: Neutral
It has come to BBFA's attention that during the late season there have been many complaints about overline fishing activities outside the western boundary of the Egegik District. After reviewing this, we believe that this is an enforcement issue. Apparently, there are not enough enforcement personnel in this district in the late season. Looking forward to the 2026 fishing season we are requesting that the Alaska Troopers extend their time commitment for enforcement in this district and budget for this action, as necessary.

Gear Specifications

Proposal 75: Neutral

Proposal 76: Support (Regarding permit stacking proposals, BBFA supports proposal 76.)

BBFA supports permit stacking in Bristol Bay. Permit stacking would be a next step to further the successes of the dual permit rule. 466 permit holders utilized the dual permit rule during the 2025 season. The result of this is a reduced fleet size which approaches the optimum number cited by CFEC. Also, the corresponding amount of gear removed from the fisheries has resulted in better catches of sockeye salmon for the fleet in general.

Proposal 77: Oppose

Proposal 78: Neutral

Proposal 79: Neutral

Proposal 80: Neutral

Proposal 81: Oppose

Vessel Specifications

Proposals 82-91: Support with Amendments

The current boat length limit regulation is unenforceable and therefore is not a law but merely words on paper, too complicated and open to interpretation. BBFA supports a length limit regulation that is simple, clear and enforceable.

The Alaska Wildlife Troopers (AWT) submitted comments to the Board of Fisheries dated 9/28/23 voicing concern with the current boat length limit and stated that they support a change in the regulation. They commented, **"Alaska Wildlife Troopers (AWT) believes having a maximum overall length with no exceptions is the simplest to interpret and straightforward to enforce.** Having a maximum distance from the most forward extremity to the aft extremity eliminates all confusion on what is allowed."

The AWT also stated that "Having exceptions allows for different interpretations of the definition of an allowable item, thus creating confusion and arguments."

There are two options to provide an enforceable boat-length limit law in Bristol Bay:

1. Measure the vessel length overall (LOA), including all extensions, not to exceed 37 feet.
   This option would bring the current fleet into compliance.
   This option would allow the current fleet, many of which are 12 feet wide class, to be lengthened at a fraction of the cost of new and used vessels.

2. Retain the current 32-foot vessel hull length only and allow all non-flotational extensions.
   This option would also bring the current fleet into compliance.

Either of these options would make the length limit law clear, enforceable and would restore the regulation to what it originally was intended.

Fishing Periods, Seasons, and Reporting

Proposal 92: Oppose

Proposal 93: Neutral

Proposal 94: Neutral

Proposal 95: Neutral

Sport Fisheries

Proposals 96-104: Neutral

Proposal 105: Oppose

Formal Response to ADF&G Staff Comments on Proposals 61 and 62: Nushagak District King Salmon Stock of Concern Management Plan

Submitted by:
Jordan Head
Executive Director - Bristol Bay Science and Research Institute (BBSRI)

Executive Summary

This document provides a formal response to a statement contained in the Alaska Department of Fish and Game's staff comments on Proposals 61 and 62 asserting that *"basing commercial fishing opportunity on sockeye salmon abundance rather than king salmon abundance as the primary tool for king salmon rebuilding has been controversial, because rebuilding king salmon becomes secondary to sockeye salmon harvest opportunity once the trigger is met*."

Our intent in submitting this response is not to dispute the Department's broader analysis or conservation objectives, but to ensure the Board has a clear and accurate understanding of how the Nushagak District King Salmon Stock of Concern Management Plan is structured to function in practice.

The plan does not prioritize sockeye harvest opportunity over king salmon rebuilding. Rather, it reflects the Board's direction, developed through a multi-year, Board-chartered committee process, to conserve king salmon effectively while avoiding false precision under known assessment uncertainty. King salmon status and abundance determine when heightened conservation applies; sockeye abundance determines how those conservation actions are scaled so they remain biologically meaningful for king salmon across all sockeye salmon run sizes.

Critically, sockeye-scaled tools under the plan do not end once triggers are met and the commercial fishery begins. **Sockeye salmon Optimal Escapement Goals (OEGs) require continued management action after the fishery opens, including breaks in fishing time, to ensure additional king salmon continue to pass into the river throughout the season.** This design ensures that king salmon conservation does not become secondary once an opening trigger is met but instead remains active and enforceable before *and during* the fishery.

This intent is explicitly documented in Board of Fisheries Finding 2023-303-FB adopted concurrently with the plan, which states that tiered sockeye salmon OEGs are intended to restrict early fishing and require continued management during the latter portion of the king salmon run to ensure adequate protection of king salmon stocks.

In short, this document clarifies that:

- The Stock of Concern designation and king salmon abundance trends are what drive use of the plan,
- Sockeye-scaled triggers and OEGs are used to implement and sustain king salmon conservation across highly variable sockeye run sizes,
- In 2018, the Board determined that prescriptive, king-number-based triggers were not defensible given uncertainty in sonar-based king salmon estimates (RC 84; RC 51), leading directly to the committee process and current plan structure,
- The plan was developed by a thorough committee process, extensive engagement with advisory committees and regional stakeholders, and was adopted unanimously by the Board of Fisheries at the March 2023 statewide meeting, reflecting a high level of consensus, and
- The plan reflects Board intent and committee recommendations.

The sections that follow provide the historical context and regulatory mechanics supporting this clarification.

Introduction

The Bristol Bay Science and Research Institute (BBSRI) has worked closely with the Alaska Department of Fish and Game (ADF&G) for many years to support science-based management of Bristol Bay salmon fisheries. That collaboration has been essential to navigating increasingly complex biological, social, and operational challenges, particularly for Nushagak River king salmon.

In reviewing the Department's staff comments on Proposals 61 and 62, BBSRI agrees with much of the Department's narrative and technical background. Specifically, we agree with the Department's acknowledgment of the uncertainty associated with in-season king salmon abundance estimates, the limitations of sonar-based enumeration, especially during periods of high sockeye passage, and the importance of abundance-based management approaches that allow managers to respond to highly variable run sizes while protecting escapement goals.

We also recognize and appreciate that the Department's comments describe real and unavoidable tradeoffs inherent in managing mixed-stock, mixed-use fisheries in the Nushagak District, including foregone sockeye harvest associated with conservation actions intended to protect king salmon.

However, within this broader, analytical framework, one statement in particular warrants clarification to ensure the Board has an accurate understanding of how the current Stock of Concern Management Plan functions and why it was designed as it is.

Clarifying the Department's Statement in Context

In its comments on Proposals 61 and 62, the Department states that *"basing commercial fishing opportunity on sockeye salmon abundance rather than king salmon abundance as the primary tool for king salmon rebuilding has been controversial, because rebuilding king salmon becomes secondary to sockeye salmon harvest opportunity once the trigger is met."*

This statement risks obscuring important context that is otherwise present in the Department's discussion, and the Board's stated intent of the plan in Board of Fisheries Finding 2023-303-FB. The Stock of Concern Management Plan was not designed to prioritize sockeye salmon harvest over king salmon rebuilding, nor to replace king salmon-based management with sockeye-based management. Rather, it reflects a deliberate, Board-directed effort to conserve king salmon **under conditions of known assessment uncertainty**, while maintaining abundance-based management and shared conservation burden across fisheries.

As the Department notes in its comments, in-season king salmon abundance estimates are subject to substantial uncertainty, particularly during periods of high sockeye passage when kings represent a very small fraction of total fish counted. The plan is structured to account for that reality. King salmon status and abundance trends determine **when** heightened conservation measures apply, while sockeye salmon abundance determines **how** those conservation measures are implemented; scaling actions so they are biologically meaningful, operationally consistent, and responsive to widely varying run sizes and timing.

Without this context, the Department's statement can be interpreted as suggesting that king salmon rebuilding becomes secondary under the plan once the commercial fishery opens. In fact, the opposite is true: the plan uses sockeye-scaled tools precisely because they are the most reliable way to implement abundance-based conservation actions when king salmon abundance is low and king salmon assessment precision is limited, ensuring that king salmon conservation remains active and effective before and throughout the commercial fishery, consistent with the Board's stated intent in adopting the Stock of Concern Management Plan.

The Historical Context Matters and Is Foundational

The current Stock of Concern Management Plan is the product of a deliberate, Board-directed process that began at the 2018 Bristol Bay Board of Fisheries meeting.

At that meeting, the Board heard testimony on Proposals 41 and 42, which sought a mechanism to pair restrictions between the sport and commercial fisheries for king salmon conservation. In response, the Board removed several existing plan triggers affecting the sport fishery to provide managers greater flexibility in dealing with uncertainty and imprecision in escapement information, tabled Proposals 41 and 42, and established the Nushagak King Salmon Management Committee through RC 84 to develop a comprehensive solution.

This action reflected a clear and consequential determination by both the Board and the Department.

As documented in RC 84 (2018), uncertainty in sonar-based king salmon escapement estimates had reduced the usefulness of prescriptive management and *"may have caused unwarranted restrictive actions."* The Board's adoption of RC 51 (2018), which removed intermediate sonar-based triggers from regulation, was an explicit acknowledgment that **multi-tiered, prescriptive regulatory actions tied directly to projected king salmon abundance were not defensible under existing data limitations**.

While the immediate regulatory changes applied to the sport fishery, the underlying conclusion was broader and foundational: **king salmon abundance estimates, as they existed in 2018, were not sufficiently precise to serve as the sole basis for management actions**.

That determination framed everything that followed.

The Committee Process Was Built on That Understanding

The Nushagak King Salmon Committee was chartered by the Board because of the determination that prescriptive management structures tied directly to king salmon numbers were not acceptable, given known uncertainty in king salmon assessment.

Accordingly, the committee was explicitly charged to develop a **comprehensive solution** that:

- Accounted for uncertainty in escapement goals and in-season assessment,
- Avoided reliance on multi-tiered triggers based solely on king salmon abundance, and
- Conserved king salmon while avoiding unnecessary and uneven restrictions across fisheries.

Between 2019 and 2022, the committee, comprised of representatives from commercial, sport, and subsistence fisheries, technical experts, and ADF&G staff, operating by consensus, evaluated extensive technical analyses addressing sonar uncertainty, run timing, fishery selectivity, and the performance of various management structures.

Among the themes that emerged from discussion and analysis was the recognition that **fixed numeric triggers perform inconsistently across the wide range of sockeye run sizes observed in the Nushagak District**, producing variable conservation benefit and disproportionate opportunity costs depending on sockeye run strength.

What the Plan Does

It is essential to be precise about how the Stock of Concern Management Plan functions, because its structure does not support the interpretation that *rebuilding king salmon becomes secondary to sockeye harvest opportunity*.

Stock of Concern designation activates the plan

The plan applies **while Nushagak River king salmon are listed as a stock of management concern**, and it is intended to remain in effect for the duration of that designation. That designation reflects sustained trends in king salmon abundance and performance relative to escapement goals. In this sense, the use of the plan is fundamentally driven by (low) king salmon abundance and status.

While the stock is designated a Stock of Concern, the Board directed in the SOC Management Plan, subsection (b), that all Nushagak District salmon stocks be managed conservatively to protect king salmon, consistent with the Sustainable Salmon Fisheries Policy. To protect king salmon as directed, the plan institutes **commercial fishery start triggers, sockeye salmon Optimal Escapement Goals (OEGs), and annual limits in the sport fishery** that are more conservative than the underlying regulations, sustainable escapement goals and management practices. These plan elements are in place *because* king salmon are a Stock of Concern, to directly afford king salmon conservation, and are not *secondary to* sockeye salmon management.

King salmon abundance activates the strictest conservation actions

Within the Stock of Concern framework, projected king salmon abundance determines when the most restrictive commercial conservation measures apply. The plan explicitly requires that before June 28, *if the Nushagak River king salmon inriver run is projected to be less than 95,000 fish*, the commissioner must close the commercial sockeye salmon fisheries until reopening criteria are met.

This 95,000-fish benchmark activates stringent in-season commercial restrictions within the plan, and it is directly tied to king salmon abundance. Notably, the threshold is set well into the SEG range, as opposed to the lower bound of the SEG. At this level, the plan applies its highest level of protection not only to poor king salmon runs not expected to meet the SEG lower bound, but also to king salmon runs strong enough to achieve escapements expected to produce the highest levels of future king salmon yields.

Sockeye abundance scales how conservation is implemented

When the 95,000 king salmon projection threshold is not being met, opening of the commercial fishery is conditioned on sockeye passage start triggers expressed as percentages of the sockeye run size. These triggers were intentionally designed to scale with sockeye abundance so that conservation actions result in a consistent and meaningful delay in the fishery across a wide range of sockeye salmon run sizes, including the very large run sizes observed in recent years, to ensure king salmon protection.

Unlike the commercial fishery start triggers, sockeye salmon Optimal Escapement Goals are not initiated by an annual king salmon abundance threshold, but instead are a standing conservation measure implemented as a result of the Stock of Concern designation. These percent-based, sockeye-scaled OEGs expand during large runs and contract during smaller runs, preserving king salmon conservation effectiveness while balancing opportunity costs. As sockeye runs increase in magnitude, more sockeye – and with them, more king salmon – pass the district and enter the river. Meeting higher OEGs requires managers to implement daily closures in fishing time *after* the commercial fishery opens, in addition to delaying the start of the fishery. The plan's sockeye salmon OEGs and resultant daily closures thereby inherently *ensure that rebuilding of king salmon **does not** become secondary to sockeye salmon harvest opportunity once the trigger is met.*

This function of sockeye salmon OEGs is not incidental. In the Board of Fisheries Finding 2023-303-FB adopted immediately following the implementation of the Stock of Concern Management Plan, the Board expressly stated that sockeye OEGs are intended to restrict early season fishing, reduce aggressive fishing later in the king salmon run, and provide continued protection of king salmon during both the early and latter portions of the run. The finding further explains that tiered OEGs are designed to scale conservation actions as sockeye run size increases, while ensuring adequate king salmon passage through the district.

King salmon abundance remains embedded in sport management

Finally, king salmon abundance remains an explicit management consideration in the sport fishery. While the Stock of Concern designation imposes annual limits on the harvest of large king salmon, the plan also allows for increased sport harvest opportunity if the total inriver king salmon run is projected to exceed 95,000 fish. This further underscores that king salmon abundance remains an active and explicit component of management under the plan.

This Is Not "Sockeye-Based King Management"

The Department's statement risks conflating **management objectives** with **management levers**.

The objective of the Stock of Concern Management Plan is king salmon conservation. That objective is established through Stock of Concern designation and reinforced through king-based abundance thresholds embedded throughout the plan.

Sockeye abundance is used as a management lever because it is:

- Measured with substantially greater precision than king salmon abundance; and
- The only practical mechanism available to scale king salmon conservation consistently across extreme sockeye run-size variability.

This distinction, king salmon abundance and status determining **when** conservation applies, and sockeye abundance determining **how** conservation is implemented, was a central outcome of the committee process and was relied upon by the Board in adopting the 2023 plan. This distinction is further reinforced by the Board of Fisheries Finding 2023-303-FB, which states that sockeye salmon OEGs are intended to guide restrictive management actions throughout the king salmon run, including after fishing begins, to ensure continued king salmon conservation.

Closing

BBSRI respects the Alaska Department of Fish and Game's role in managing Bristol Bay fisheries and values its long-standing collaborative relationship with the Department. We share the Department's recognition of the challenges inherent in managing Nushagak River king salmon under conditions of assessment uncertainty, mixed-stock fisheries, and highly variable run sizes.

Our intent in submitting this response is not to dispute the Department's broader analysis or conservation objectives, but to ensure that the Board has an accurate understanding of the rationale behind the Stock of Concern Management Plan and the way it is structured to function in practice.

The plan does not prioritize sockeye harvest opportunity over king salmon rebuilding. Rather, it reflects the Board's direction, developed through a multi-year, Board-chartered committee process, to conserve king salmon effectively while avoiding false precision and ensuring that conservation actions are scaled in

a biologically meaningful and operationally consistent manner. King salmon status and abundance determine when heightened conservation applies; sockeye abundance determines how those conservation actions are implemented before and during the commercial fishery. This understanding is consistent with the Board's intent, as documented in Board of Fisheries Finding 2023-303-FB, which clarifies that sockeye-scaled management tools are intended to guide restrictive management actions before and throughout the commercial fishery to ensure continued protection of king salmon.

We agree with the Department that abundance-based management, shared conservation burden, and responsiveness to in-season information are essential principles in Bristol Bay. The current plan embodies those principles as adopted by the Board.

For these reasons, BBSRI respectfully encourages the Board to evaluate the Stock of Concern Management Plan, and any proposed changes to it, in light of its full historical context, regulatory design, and relevant Board Findings.

Publicly Available Background Materials

The following publicly available documents provide much of the background discussed in this document:

- *Historical Review of Nushagak River King Salmon Management (2022)*
- *Summary of Outcomes from the Nushagak King Salmon Committee (2019–2022)*
- *Summary of Outcomes from the 2022-2023 Board of Fisheries related to Nushagak King Salmon (2025)*

These documents are available on the Bristol Bay Science and Research Institute website and were prepared for public and Board review (www.bbsri.org/king-committee).

Appendices – Board Record Documents Provided for Reference

The following appendices are provided solely for the convenience of the Board and the public. Each document is part of the existing public record of the Alaska Board of Fisheries and is included here simply for ease of locating these historical documents.

These materials are not offered as new evidence, but as readily accessible references reflecting Board direction and intent relevant to the Nushagak District King Salmon Stock of Concern Management Plan.

Appendix A
RC 84 (2018 Bristol Bay BOF Meeting) – Board of Fisheries Record Change establishing the Nushagak King Salmon Management Committee and documenting the Board's recognition of uncertainty in in-season king salmon abundance estimates and the need for a comprehensive, committee-based management approach.

Appendix B
Board of Fisheries Finding 2023-303-FB – Board Finding adopted following implementation of the Nushagak District King Salmon Stock of Concern Management Plan, documenting Board intent regarding the role of sockeye salmon Optimal Escapement Goals and continued conservation measures before and during the commercial fishery.

Submitted by ADF&G at the request of Board Member Ruffner, December 2, 2018

Nushagak-Mulchatna King Salmon Management Plan (NMKSMP)

At the 2018 Bristol Bay meeting held in Dillingham, proposals were submitted that called for changes to the NMKSMP (5 AAC 06.361). A small group of stakeholders including the author of two relevant proposals met with three members of the Alaska Board of Fisheries (Board) and multiple Alaska Department of Fish and Game (ADF&G) staff. There was a consensus in the group to modify the NMKSMP by striking provisions (d) 2 and 3 as described in (RC51). This removes sonar triggers that auto-restrict the sport fishery. Removing these trigger provisions from NMKSMP (RC51) will allow ADF&G to consider sonar data along with other in-season information in managing fisheries to ensure the escapement goal is met.

The parties present recognized two concerns that need additional consideration:

1) Uncertainty in sonar data used to establish the king salmon escapement goal and recent in-season issues with the accuracy and precision of sonar counts may have caused unwarranted restrictive actions.

2) Restrictions in the sport fishery for king salmon without actions in the commercial sockeye fishery may or may not be achieving necessary conservation needs and should be considered in the context of sharing a conservation burden.

To address these concerns, ADF&G in collaboration with a stakeholder-led study team will review all data related to the enumeration of Nushagak River king salmon, and identify options to improve this information and management of Nushagak River king salmon. To support this effort, ADF&G would accelerate updating the Nushagak River king salmon escapement goal prior to March 2020. The study team will provide a progress report to the board at the October 2019 work session.

Concurrent with the technical enumeration study effort, the Board Chair will appoint a working committee (WC) consisting of no more than 9 members of the public and 3 members of the board for a total of 12. The WC will be supported by the technical study team and provide input to the help guide the team's work products. The WC committee will meet prior to the Oct. 2019 Board Work Session, receive a preliminary update from ADF&G on the enumeration efforts and set a schedule that includes a target of generating a proposal for any changes to NMKSMP to the Board for consideration at the Statewide Meeting in March 2020. This schedule signals the intent of this board to address the topic of the NMKSMP before the next regular Bristol Bay cycle if new information can refine the plan; however, it does not guarantee any particular outcome.

In addressing the allocative issue, the WC will acknowledge and adhere to the goals of the Sustainable Salmon Policy (5 AAC 39.222), as well as the concept of sharing the conservation burden as outlined in the Sustainable Salmon Policy. The WC will also recognize and consider that any hard trigger closures need to acknowledge tradeoffs between sockeye and king salmon. (i.e. is it in the best interest of the state to forego 100,000 sockeye salmon for 1,000 king salmon; 1,000,000 for 10?)

PC32
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ALASKA BOARD OF FISHERIES
Finding in the Establishment of Optimal Escapement Goals for Nushagak River Sockeye Salmon for the Conservation of King Salmon
2023–303–FB

The creation of an OEG for Nushagak River sockeye salmon provides guidance to managers to restrict early season fishing for sockeye salmon to allow for king salmon passage through the district. The tiered OEG seeks balance between allowing for restrictive actions to protect king salmon while at the same time setting upper guidelines for controlling sockeye salmon escapement.

An OEG provides guidance for consistently conservative management steps based on the preseason forecast sockeye salmon run size. Setting OEG tiers that are greater than the upper end of the sustainable escapement goal for Nushagak River sockeye salmon allows more conservative management and less fishing time on sockeye salmon. Less fishing, especially early season, will reduce king salmon commercial harvest. A tiered OEG provides a sliding scale of implementation to reduce the potential for sockeye salmon over escapement as sockeye salmon run size increases while providing for king salmon conservation.

In addition to conserving the earlier portion of the king salmon run, OEGs should reduce the need to prosecute the sockeye salmon fishery aggressively during the latter portion of the king salmon run since the OEGs are larger than the SEG and accommodate a broader range of sockeye salmon escapement levels than the SEG. It is the board's intent that the department manage the commercial sockeye salmon during the latter portion of the king salmon run to ensure that portion of the king salmon is adequately protected.

VOTE: 6-0
Date Adopted: March 12, 2023
Anchorage, Alaska

Märit Carlson-Van Dort, Chairman
Alaska Board of Fisheries

Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan

Prepared by:

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Box 1464, Dillingham, Alaska 99576

Prepared for:

Nushagak River and District Fishery Stakeholders

November 3, 2025

EXECUTIVE SUMMARY

In March 2023, the Alaska Board of Fisheries adopted the **Nushagak District King Salmon Stock of Concern Management Plan** in response to the continued decline of Nushagak River king salmon. The new plan, developed through a five-year, stakeholder-driven process that involved commercial, sport, and subsistence users alongside agency and technical experts, represents a significant restructuring of management for commercial, sport, and subsistence fisheries. The plan is intended to remain in effect as long as Nushagak River king salmon are designated a Stock of Concern.

This report provides an objective evaluation of how the plan has functioned in its first three years (2023–2025), with particular attention to the conservation actions taken, their performance, and alignment with the management objectives and measures of success identified during the committee process.

Key Conservation Actions

The plan introduced three primary changes:

1. **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.
2. **Sockeye Salmon Optimal Escapement Goals (OEGs):** Larger escapement targets, scaled to sockeye run size, allow the manager 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.
3. **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.

Performance of the Plan

- **Commercial Fishery:**
  The plan consistently delayed the start of the commercial fishing season by 2–5 days compared with the prior plan (Table 3). The delay of the start of the commercial fishery due to the new triggers has resulted in 6.5-10.8 thousand additional king salmon and 1.2-1.5 million additional sockeye salmon passing upriver each year before exposure to harvest (Table 3). OEGs allowed longer in-season closure

windows, reducing harvest pressure and allowing more king salmon to pass through the district unharvested (Figures 1 & 2; Appendix G). While the exact split in benefits between delayed openings and in-season closures is difficult to pin down, both mechanisms played a substantial role in conserving king salmon.

- **Sport Fishery:**
  Participation continued a declining trend and regulations further limited harvest of large king salmon.

Management Objectives & Measures of Success

The plan was designed to balance conservation of king salmon with opportunity across all user groups. While escapement goals for king salmon have not yet been achieved due to continued low production, the plan demonstrably reduced harvest pressure during periods of high vulnerability. It has also provided managers with flexibility to adapt to unprecedentedly large sockeye runs while providing conservation benefits for king salmon.

Conclusions

Because king salmon lifecycles span 4–7 years, tangible improvements in run strength and long-term biological outcomes from plan actions cannot yet be expected or assessed. However, the first three years of implementation show that the **2023 management plan appears to be functioning as intended**. It has 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.

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Introduction

At its March 2023 meeting, the Alaska Board of Fisheries substantially changed how Nushagak River and District fisheries are managed to conserve Nushagak River king salmon. The board adopted a new *Nushagak District King Salmon Stock of Concern Management Plan* in effect for as long as Nushagak River king salmon remain a Stock of Concern. The board also substantially modified the pre-existing *Nushagak-Mulchatna King Salmon Management Plan*. The 2023 plans can be found in Appendix A and B.

The Nushagak King Salmon Committee, established in 2018 and facilitated by the Bristol Bay Science and Research Institute Study Team, was instrumental in development of the new plans. Efforts by the committee and board are reviewed and discussed in detail in *Summary of the 2022-2023 Alaska Board of Fisheries process and outcomes related to the Nushagak River King Salmon Committee and Nushagak River king salmon conservation* (Brookover et al. 2025).

Three fishing seasons have now passed since the plans were adopted, and the board is scheduled to again address Bristol Bay issues including Nushagak River king salmon in January 2026. Given its role in the 2023 regulatory changes, the BBSRI Study Team set out to develop an assessment of how the new plans have worked to conserve Nushagak River king salmon during their first three years for consideration in January.

The assessment is envisioned to include an objective evaluation of actions taken under the new plans, and stakeholder input on the success of the plans in achieving their objectives. This paper presents the objective assessment. The Study Team intends to subsequently use a questionnaire to gather and summarize stakeholder input. This paper will be presented to stakeholders with the questionnaire. Both will be summarized and presented to the public and board before the January meeting.

Key Plan Conservation Actions

The Stock of Concern Management Plan (Appendix A) includes three key provisions aimed at conserving Nushagak River King salmon. Other provisions in the modified NMKS Management Plan include actions that were largely either already in place or superseded by the SOC Management Plan and are not discussed here. The key provisions adopted in 2023 include new sockeye salmon Optimal Escapement Goals, modified commercial fishery start triggers, and revised king salmon annual limits in the sport fishery.

Sockeye Salmon Optimal Escapement Goals

New sockeye salmon Optimal Escapement Goals are found in SOC Management Plan Sections (c)(3) for the Wood River and (c)(5) for the Nushagak River (Appendix A). Both are designed to boost king salmon escapement into the Nushagak River by providing a larger number of sockeye salmon into the rivers than the established Sustainable Escapement Goals (SEGs) during large sockeye runs. The OEGs use a sliding scale depending on the forecasted run size for sockeye salmon to allow for king salmon conservation scaled to sockeye run strength. The OEGs allow the manager to take breaks in fishing for king salmon conservation and preclude the need for prescriptive regulatory changes to time, area and/or gear that would otherwise be needed to afford a similar level of conservation.

OEGs were established for each of the past three seasons as directed by the plan because total run forecasts exceeded the plan thresholds of 5 million sockeye salmon for Wood River and 2.5 million for Nushagak River. OEG upper bounds established for 2023-2025 are presented in Table 1 (Elison et al. (2024), Elison et al. (2025), ADF&G (2025)). The OEG lower bound is the same as the SEG lower bound.

Table 1 -Wood and Nushagak River sockeye salmon SEG and OEG (in millions of fish), 2023-2025.

	SEG				OEG Upper Bound	
Year	Lower Bound	Upper Bound	Total Run Forecast	15% Adder	Calculated	Official (Rounded)
Wood River						
2023	0.700 -	1.800	8.010	1.202	3.002	3.0
2024	0.700 -	1.800	7.840	1.176	2.976	3.0
2025	0.700 -	1.800	7.630	1.145	2.945	3.0
Nushagak River						
2023	0.370 -	0.900	6.950	1.043	1.943	2.0
2024	0.370 -	0.900	3.500	0.525	1.425	1.4
2025	0.370 -	0.900	10.580	1.587	2.487	2.5

Managers use emergency order authority to attain the larger OEGs and associated king salmon conservation by regulating commercial fishing time. The way managers regulate time can be characterized in two ways: delay the start of the commercial fishery for sockeye salmon when king salmon are more abundant, and schedule closed periods during the commercial fishery and latter portion of the king salmon run.

Commercial Fishery Start Triggers

Modified commercial fishery start triggers, including a new trigger specifically for the Nushagak River, are found in Section (d) of the plan. This section applies to the early season before 9:00 am June 28 during years when the Nushagak River inriver goal (95,000 king salmon) is not expected to be met. It directs managers to leave the commercial fishery closed until projected escapements exceed levels stated in the plan.

The 2023 plan triggers (10% of the Wood River run forecast and 6% for the Nushagak run forecast) are intended to 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. For comparison, the trigger within the prior version of the NMKS Management Plan applied only during years when the king salmon escapement was projected to be less than the SEG (55,000) and directed the commercial fishery to remain closed until the projected sockeye salmon escapement into the Wood River exceeded 100,000 fish. The new triggers thus apply during more years, consider the Nushagak sockeye escapement as well as the Wood, and afford additional time early in the season when the commercial fishery remains closed.

Table 2 includes the triggers that applied in 2023, 2024 and 2025. Triggers applied for all years because the king salmon inriver run goal was not projected to be met in any year.

Table 2.- Commercial fishery start trigger projections (millions of fish), 2023-2025.

Year	Total Run Forecast	Fishery Start Trigger Projection
Wood River (10%)		
2023	8.010	0.801
2024	7.840	0.784
2025	7.630	0.763
Nushagak River (6%)		
2023	6.950	0.417
2024	3.500	0.210
2025	10.580	0.635

Sport Fishery Annual Limit

The modified annual limit is found in section (e) of the plan. Like the regulations prior to 2023, the provision implements an annual limit of four king salmon (20 inches or greater) for all anglers. Unlike the previous regulations, the new provision limits the number of large (28 inches or greater) king salmon an angler can harvest to one per year. The new regulation thereby affords additional protection to king salmon, particularly large king salmon, compared to previous regulations which allowed anglers to keep up to four large king salmon per year.

How Conservation Actions Performed the First Three Years

The Nushagak River king salmon runs in 2023 and 2024 were not large enough to meet the SEG lower bound of 55,000 fish had every fish survived to spawn (Elison et al., 2025). Data for 2025 remains partially unavailable but will likely show the same result once available. Data collected by current stock assessment projects for Nushagak River king salmon are fraught with uncertainty (Head and Hamazaki, 2022). With this data uncertainty in mind, the SEG has likely not been attained since the SOC Management Plan was adopted.

Because king salmon life cycles span 4-7 years, tangible improvements in run strength and long-term biological outcomes from plan actions cannot yet be expected or assessed. This section will describe how the new plan worked to conserve Nushagak River king salmon in the commercial and sport fisheries.

Commercial Fishery Results

This section discusses the performance of the SOC Management plan provisions pertaining to the commercial fishery in a chronological fashion. The fishery start trigger is discussed first, since it is implemented first seasonally, followed by conservation during the latter period of the king salmon run during the commercial fishery as provided by the OEG.

Opening Date

The effectiveness of the SOC Management Plan's fishery start triggers can be evaluated by comparing when commercial fishing opened in 2023-2025 under the new plan to when it would have hypothetically been opened under the previous NMKS Management Plan (Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication). Estimates of additional salmon passage afforded by the current plan's trigger provisions were derived by

identifying the daily escapement count that fell within the assumed travel windows for each stock between the previous plan's hypothetical start date and the start date that occurred under the new management plan. Assumed travel times used from the district to the Wood River tower is 12-24 hours, and 36-48 hours from the district to the Nushagak River sonar. Appendix C contains actual and hypothetical start dates and associated additional king and sockeye salmon passage estimates. For an example of how the current trigger provisions worked to conserve king salmon, a detailed review of 2025 is discussed below.

2025

In 2025, ADF&G Advisory Announcement #9, issued noon June 21, opened the commercial fishery June 22 at 9:00 am for set nets and 11:00 am for drift nets (Appendix C). Sockeye escapement counts through 10:00 am June 21 had totaled 485,000 in the Nushagak and 114,000 through 6:00 am in the Wood River. At the time (through June 20), 6,645 king salmon had been estimated past the Nushagak sonar.

Start trigger provisions in the SOC Management Plan were successfully implemented in 2025. Estimated passage at the Nushagak sonar exceeded the start trigger (635,000 sockeye salmon) June 21, after the announcement was issued and before the fishery opened; the cumulative June 21 sonar count was 756,000 sockeye salmon.

Assuming a 36- to 48-hour travel time from the district to the Nushagak River sonar means that fish passing the district before the fishery opened would continue to migrate past the sonar through the remainder of June 22 and June 23. Through June 23, 16,227 king salmon and 1,480,862 sockeye salmon were estimated past the sonar. These estimates account for nearly half of the total escapement over the season for king and sockeye salmon.

Assuming a 12- to 24-hour travel time to the Wood River counting tower means that 619,752 sockeye salmon counted past the tower by midnight June 22 had also migrated past the district before the commercial fishery opened.

Had the previous version of the plan been in effect, the fishery would have opened earlier, and fewer king (and sockeye) salmon would have passed the district before the commercial fishery opened. The total spawning escapement of king salmon at the sonar would very likely have been projected to be less than 55,000 fish, and under that scenario the previous version of the plan directed the department to close the commercial fishery until the projected Wood River sockeye escapement exceeds 100,000 fish.

This standard would likely have triggered a fishery opening four tides (two days) earlier, to begin June 20 because 113,000 sockeye salmon had passed the Wood River tower through that date. We reasoned the opening would likely have been scheduled for the morning

because over 83,000 sockeye salmon – very close to the 100,000 fish trigger - had passed the Wood River tower through midnight June 19. Assuming the same travel times as above, Nushagak River salmon counts through June 21 can be used for comparison. Through June 21, 9,766 king salmon were estimated past the sonar. In this scenario, the new trigger provision protected about 6,500 additional king salmon (16,227 - 9,766 = 6,461). Using a similar approach for sockeye salmon, the new provisions resulted in about 506,000 additional sockeye salmon in the Wood River and 725,000 in the Nushagak.

3-Year Summary

The department opened the commercial fishery as directed under the new SOC Management Plan in all three years. In 2023 and 2024, trigger levels for Wood and Nushagak River sockeye were achieved following the fishery opening and within assumed travel time windows (Appendix C). In both years, the Nushagak River trigger was achieved the day the fishery opened, and the Wood River trigger the following day. In 2025, the Nushagak River trigger was attained after the fishery announcement and before the fishery opening and the Wood River trigger the day after the fishery opening.

Hypothetical start dates under the previous version of the plan fell 2 to 5 days (average 3.3 days) earlier than the actual fishery openings in 2023-2025 (Table 3). In effect, the fishery was opened under the current plan 3 days later in 2023, 5 days later in 2024, and 2 days later in 2025.

In this scenario, the delayed openings each year resulted in an additional 6,500 – 10,800 king salmon passing the district before it was opened to fishing that otherwise would have been exposed to fishing pressure. Using estimates of total run provided in Elison et al. (2025), the additional passage represents approximately 21 percent of the total run in 2023 and 20 percent in 2024.

Table 3.- Actual vs hypothetical fishery opening dates and associated salmon passage.

				Additional Salmon Passage		
Year	Actual Opening Date	Hypothetical Opening Date	# Days Difference	Nushagak King Salmon	Nushagak Sockeye Salmon	Wood River Sockeye Salmon
2023	25-Jun	22-Jun	-3	8,304	625,810	861,318
2024	26-Jun	21-Jun	-5	10,794	707,044	791,208
2025	22-Jun	20-Jun	-2	6,461	725,179	506,370

The delayed fishery also resulted in an additional 626 - 725 thousand sockeye passing into the Nushagak River and 506 – 861 thousand into the Wood River each year. These

estimates represent 9, 8 and 5 percent (average 8 percent) of the total sockeye salmon run to the district (Appendix D; Elison et al. (2025), ADF&G (2025)).

Limitations to this evaluation of the fishery opening date are substantial. There is much uncertainty with Nushagak River sonar estimates. Assumed travel times are imprecise; travel times vary among fish and throughout the season based on individual fish characteristics, weather, tides and other factors. When managers would open the fishery under the previous plan is not certain and would also vary with several factors. Estimates of additional passage due to the delayed fishery opening represent fish potentially available for harvest, as opposed to actual harvest. Nevertheless, we undertook this exercise to quantify fishery performance under the new plan provisions using existing information to the extent possible. Results should be used with these limitations in mind.

Conservation During the Latter Portion of the Run

King salmon conservation during the latter portion of the run is affected by multiple factors associated with the commercial (and other) fisheries. These include: inriver management goals (in this case OEGs); king salmon and sockeye salmon run size, abundance and distribution; fishing effort (no. of permits, boats, sites) and patterns, fishing time; weather and other factors. Most factors are dynamic and can change on a tidal basis. This assessment focused on fishing time because it is the primary factor under the manager's control used to achieve established OEGs and thereby conserve king salmon.

Commercial fishing time was assessed by comparing performance over the three years since the plan was adopted (2023-2025) with a 3-year period before the plan was adopted to understand how the SOC Management Plan conserved king salmon during the commercial fishery for sockeye and the latter portion of the king salmon run. For the latter period, we chose 2017-2019 for two reasons. One was that sockeye production had resulted in large (greater than 10 million) runs to the district beginning in 2017 and continuing to present years. So, the period 2017-2019 captured large sockeye salmon runs like those observed more recently. And two, the department began managing the commercial fishery more conservatively than plans directed for king salmon after several years of large sockeye runs (and small king salmon runs). Thus, the three early years of large sockeye runs provide a clearer contrast to the new plan's performance in comparison to the old plan than 2020, 2021 and 2022, when the department had begun managing "outside" of the existing plan.

Fishing Time

Once the fishery opened, managers scheduled periods of time open to fishing interspersed with closed periods on a tide-by-tide basis to regulate harvest and thereby achieve sockeye

salmon OEGs and allow king salmon to pass through the district without exposure to harvest.

The commercial drift net fishery opened an average of 3.7 days later from 2023-2025 when compared with 2017-2019 (Appendix E) due in large part to the start trigger provisions as discussed above.[1]

During 2023-2025, total drift fishing time between June 20 and 25 was reduced by roughly 40 hours (75%) per year compared to 2017-2019 (Table 4; Figure 1). Drift fishing was opened on only five days prior to June 26; one day in 2023 and four days in 2025 for an average of 8 hours/day. During 2017-2019 for comparison, drift fishing was opened each of the six days from June 20-June 25 except 2017, when it was opened four of the six days, and averaged about 10 hours per day.

Table 4.- Average number of hours open to commercial drift gillnet fishing per year in the Nushagak District by period, comparing 2017-2019 and 2023-2025.

Time Block	2017 - 2019 Annual (hrs)	2023-2025 Annual (hrs)	Reduction (hrs)	Reduction (%)
June 20-25	53.5	13.5	40.0	74.8%
June 26-30	86.5	49.5	37.0	42.8%
July 1-5	88.5	80.8	7.7	8.7%
June 20-July 5	228.5	143.8	84.7	37.1%

[1] Sources: Elison et al. (2018), Salomone et al, (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

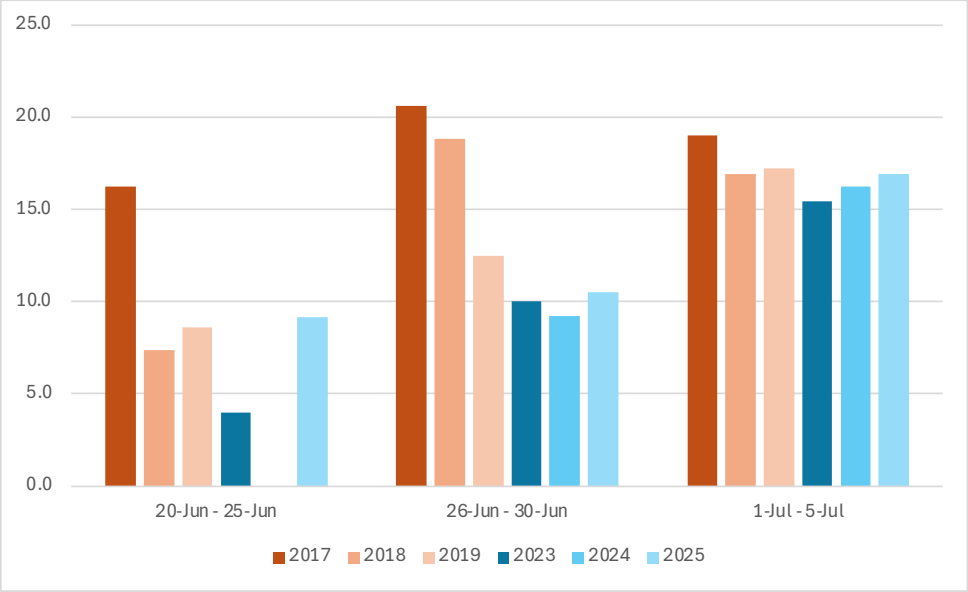

Figure 1.- Average number of hours open to commercial drift gillnet fishing per day in the Nushagak District by period.
Note: in 2023, fishing was only open for 1 day between 20 June and 25 June for 4 hours. In 2024, fishing was not opened between 20 June and 25 June. In 2025, fishing was open for 4 days between 20 June and 25 June and averaged 9 hr/day.

In addition to being open fewer days, the drift fishery was also opened for fewer total hours per year across the entire early-season (June 20-July 5): 144 hours versus 229 hours in 2017-2019, representing a 37% reduction in overall drift fishing time. These reductions were most pronounced during the early portion of the season (June 20-30), when king salmon overlap with the commercial fishery is greatest.

Trends in fishing time for setnets were similar, but the reductions were even more pronounced. The fishery opened to set nets an average of 4.3 days later per year from 2023-2025 when compared with 2017-2019 (Appendix Table F).[2] Total set-net fishing time per year between June 20 and 25 decreased by about 87 hours (83%), and across the entire June 20-July 5 period, total time open per year was reduced from 341 hours to 184 hours, a 46% decrease (Table 5).

[2] Sources: Elison et al. (2018), Salomone et al, (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Table 5.- Average number of hours open to commercial set gillnet fishing per year in the Nushagak District by period, comparing 2017-2019 and 2023-2025.

Time Block	2017 - 2019 Annual (hrs)	2023-2025 Annual (hrs)	Reduction (hrs)	Reduction (%)
June 20-25	104.7	18.0	86.7	82.8%
June 26-30	120.0	65.0	55.0	45.8%
July 1-5	116.7	101.5	15.2	13.0%
June 20-July 5	341.3	184.5	156.8	45.9%

These reductions again occurred during the early portion of the run when conservation benefits for king salmon are the greatest.

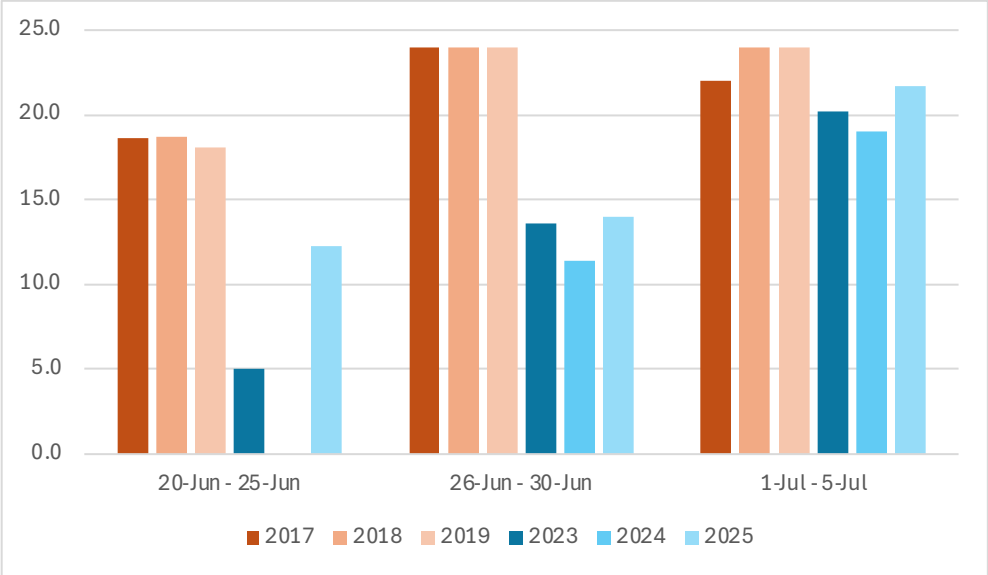

Figure 2.- Average number of hours open to commercial set gillnet fishing per day in the Nushagak District by period.
Note: in 2023, fishing was only open for 1 day between 20 June and 25 June for 5 hours. In 2024, fishing was not opened between 20 June and 25 June. In 2025, fishing was open for 4 days between 20 June and 25 June and averaged 12.3 hr/day.

Optimal Escapement Goals

New optimal escapement goals for Wood and Nushagak River sockeye salmon were met or exceeded in 2023, 2024 and 2025 (Table 6; Elison et al. (2025), ADF&G (2025)). Escapements for the Wood and Nushagak River fell within the upper portion of the OEG range in 2023. Escapements in 2024 exceeded the OEG Upper Bound for both rivers; by 1.4 million fish in the Wood and 300 thousand in the Nushagak. In 2025, Wood River escapement fell within the upper portion of the OEG range and Nushagak escapement exceeded the OEG range by about 800 thousand sockeye salmon.

Differences between actual escapements and SEG Upper Bounds represent sockeye salmon which were not available for harvest because of reduced fishing time for king conservation in accordance with the SOC Management Plan; absent the SOC Management Plan, these fish would have been available for harvest. Over the 3-yr period, 849 thousand to 2.6 million additional sockeye salmon migrated into the Wood River, and 823 thousand to 2.4 million sockeye salmon above the SEG Upper Bound migrated into the Nushagak River.

Table 6.- Sockeye escapement goals vs actual escapement estimates in millions of fish, 2023-2025.

	SEG					
Year	Lower Bound		Upper Bound	OEG Upper Bound	Estimated Escapement	Difference between Escapement and SEG UB
Wood River						
2023	0.700	-	1.800	3.002	2.649	0.849
2024	0.700	-	1.800	2.976	4.405	2.605
2025	0.700	-	1.800	2.945	2.657	0.857
Nushagak River						
2023	0.370	-	0.900	1.943	1.773	0.873
2024	0.370	-	0.900	1.425	1.723	0.823
2025	0.370	-	0.900	2.487	3.261	2.361

Both the delayed fishery starts and reduced fishing time during the season worked as intended under the OEG by reducing harvest and increasing escapement of both king and sockeye salmon. To compare the king salmon conservation benefits of delayed openings with that of the later-season closures, we can look at the estimates of additional sockeye passage in Tables 3 & 6 (Appendix G).

In 2025, the delayed opening resulted in an estimated 1.23 million additional sockeye salmon passing upriver (506,000 in the Wood River and 725,000 in the Nushagak River; Table 3). Relative to the total additional passage afforded by the OEG that year (about 3.22 million fish; Table 6; Appendix G), the delayed start accounted for roughly 38 percent. Breaks in fishing time after the season was underway contributed to the remaining 62 percent of additional conservation benefit in 2025.

Over all three years, delayed openings accounted for about 86 percent of the additional passage in 2023, 44 percent in 2024, and 38 percent in 2025. On average, the start triggers provided about 56 percent of the additional passage and corresponding king salmon conservation, while in-season breaks in fishing contributed to the other 44 percent (Appendix G).

However, it is important to recognize that this analysis rests on several assumptions. First, we likely overestimated the conservation benefits of the start triggers. If the fishery had opened earlier, not all the fish estimated to have passed would have been harvested, as they would have been subject to harvest rates lower than 100 percent. Some portion would still have escaped upriver regardless. At the same time, the analysis also assumes that under the old management plan scenario, managers could have held escapements within the SEG targets of 1.8 million sockeye salmon for the Wood River and 0.9 million for the Nushagak River. If that had not been possible, then we likely overestimated the conservation benefits attributed to later-season closure periods. In other words, there are biases in both directions. While the exact split in benefits between delayed openings and in-season closures is difficult to pin down, this comparison makes clear that both mechanisms played a substantial role in conserving king salmon, and that the combination of start triggers and later closures together are central to the effectiveness of the management plan.

Sport Fishery Results

Two trends have been observed in the sport fishery since the adoption of the SOC Management Plan in 2023.

Participation

Sport fishing effort estimated on the Nushagak River mainstem has generally declined from high levels observed in 2005 and 2006 (Alaska Sport Fishing Survey database [Internet]). This decline continued in recent years, and steepened in 2023, when an estimated 557 anglers fished on the Nushagak River from Black Point to the sonar site, and 861 from the sonar site to the Mulchatna River (Figure 3). The number of anglers fishing these sections in 2023 represent 41 percent and 67 percent of the average fishing effort from 2017-2022.

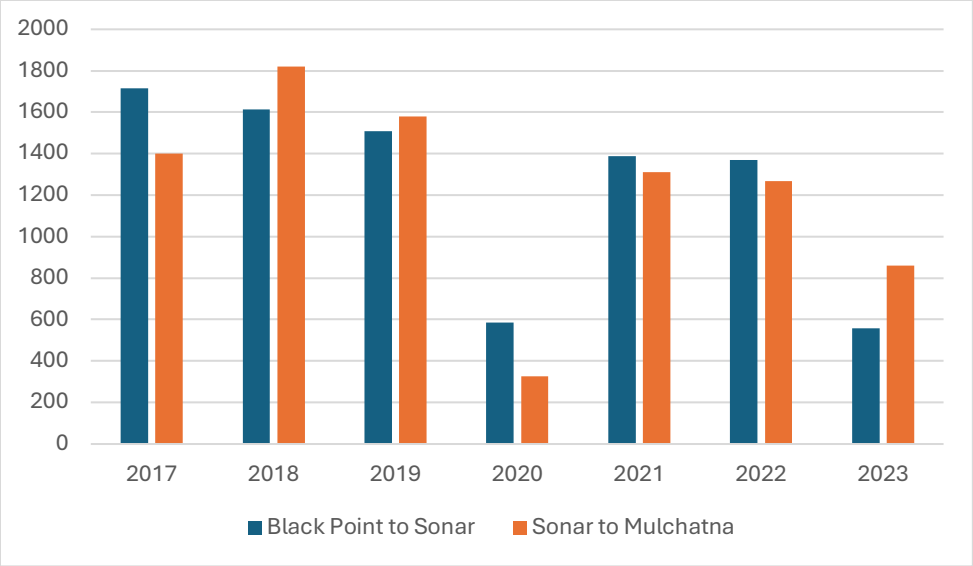

Figure 3.- Number of anglers sport fishing on two Nushagak River sections, 2017-2023.

Reasons for the general decline include factors such as economic conditions, expectations of fishing success and, in 2020, impacts from Covid. Angler uncertainty over the ability to harvest fish given the possibility of inseason catch-and-release restrictions is a likely factor contributing to both the longer-term decline and the reduced effort in 2023. Specific causes of the steep reduction in effort observed in 2023 are unknown. However, the reduced ability to harvest large fish under the annual limit provisions in the SOC Management Plan likely contributed to reduced effort in 2023 (Lee Borden, personal communication).

Biological Characteristics of Fish Harvested

The size, sex and age composition of king salmon harvested in the sport fishery exhibited similar declining trends. King salmon harvest sampled during ADF&G creel surveys conducted in 2023 and 2024 were 21 and 28 percent smaller than king salmon sampled in 2007 based on mean length (Table 7).[3]

King salmon 28 inches or greater in length, of which one is allowed per angler per year, comprised 27 percent and 14 percent of the sampled harvest in 2023 and 2024. Although the percentage of king salmon 28 inches or larger was not reported from the 2007 creel surveys, mean fish size reported that year was nearly 30 inches in length, indicating fish 28 inches or larger comprised over half of the harvest. Therefore, the percent of fish 28 inches or greater as sampled in 2023 and 2024 was less than half that sampled in 2007. Applying these percentages to available Nushagak River harvest estimates for 2023 (2,327 king

[3] Sources: Dye (2012), Hayden-Pless (2024a), Hayden-Pless (2024b).

salmon; Alaska Sport Fishing Survey database [Internet]) results in an estimate of 507 king salmon 28 inches or greater. For comparison, king salmon 28 inches or greater comprised over half of the Nushagak River harvest estimated for 2006 (7,429 king salmon).

The percentage of females in the harvest samples was also lower in 2023 and 2024.

Table 7.- Biological sampling results from ADF&G creel surveys conducted on the Nushagak River. Fish length measured mid-eye to tail fork.

			>28 inches		Females	
Year	Sample Size	Mean Length (mm)	Number	Percent	Number	Percent
2007	231	752				36%
2023	179	597	49	27%	39	22%
2024	202	542	28	14%	38	19%

Samples collected from harvested fish in 2023 and 2024 were comprised of younger age classes when compared with king salmon harvest sampled in 2007 (Figure 4). In 2007, age 1.3 and 1.4 fish were dominant and age 1.5 fish were present. Age 1.5 fish were absent, and age 1.4 fish comprised the weakest class in the samples in 2023 and 2024 indicating more older fish, which tend to be comprised mostly of females, were available to spawn.

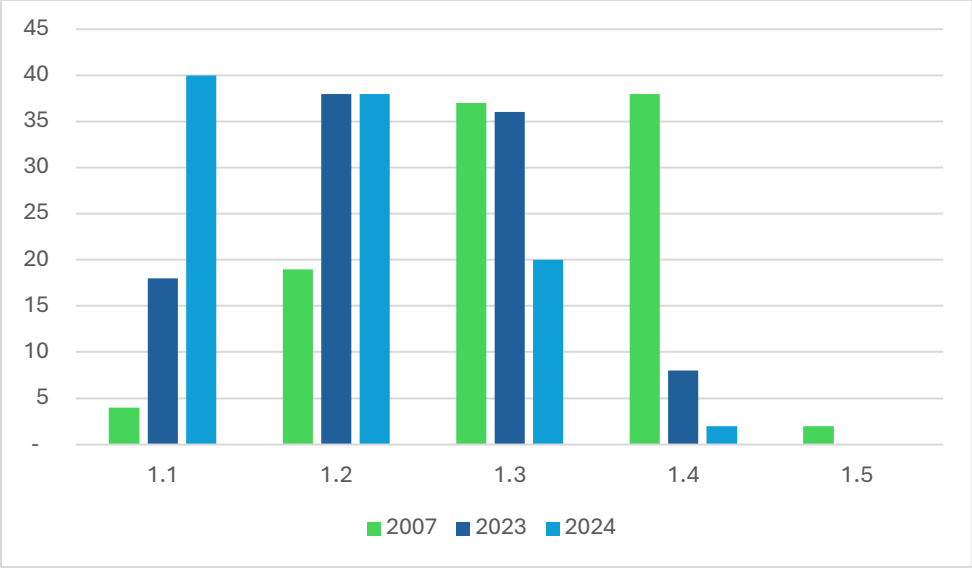

Figure 4.- Percent king salmon sampled from sport harvests by ADF&G creel surveys.

Based on creel survey results, sport harvests since the plan was adopted in 2023 are comprised of smaller king salmon, fewer females, and younger age fish. These trends,

likely due in part to the new annual limit provisions, are also likely due to differences in run composition and other factors in addition to harvest regulations.

Measures of Success

To conclude the assessment, the BBSRI Study Team will use a questionnaire to gather and summarize stakeholder input. Stakeholders may be asked to consider the Management Objectives developed by the Nushagak King Salmon Committee and adopted by the board in the 2023 NMKS Management Plan, as well as Measures of Success developed by the Committee. Both are presented here for reference and can be found in more detail in Brookover et al. (2022).

Management Objectives

(1) to provide consistent sport fishing opportunity within and among seasons, including a level of inriver abundance as a given year's run timing allows, and a predictably open season.

(2) to provide a directed commercial king salmon fishery when surplus is available.

(3) to minimize disruptions to the commercial sockeye salmon fishery.

(4) to provide reasonable opportunity for subsistence harvest of king salmon.

(5) to ensure the subsistence fishery is the last fishery restricted or closed.

(6) to achieve escapement goals for all species in the district.

(7) to maintain a representation of age classes in the escapement similar to the run.

Measures of Success

Sport fishery

(1) Inriver abundance and catch opportunity.
(2) Predicably open season.
(3) Harvest opportunity.

Commercial fishery

(4) Access to a directed king salmon fishery when a harvestable surplus of king salmon exists.
(5) Access to available surplus sockeye salmon subject to addressing other concerns, including but not limited to: sustaining the king salmon population, avoiding a line fishery, obtaining escapement throughout the season, attaining allocation goals among

gear groups, and ensuring annual harvest rates do not reach excessively high rates (e.g. >85-90%).

(6) The fishery is kept to the traditional area.

(7) Achieve sustainable escapement goals among salmon stocks in the district.

Subsistence fishery

(8) Reasonable opportunity.

(9) Amounts necessary for subsistence.

(10) Subsistence priority over other uses.

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Appendices

Appendix A – 2023 Stock of Concern Management Plan.

5 AAC 06.391 - Nushagak District King Salmon Stock of Concern Management Plan

(a) The purpose of this management plan is to provide management tools and guidelines to the department for the management of Nushagak District salmon fisheries, while Nushagak River king salmon are listed as a stock of management concern, which will result in the sustained yield of king salmon stocks large enough to meet sustainable escapement goals, while allowing for harvest opportunity in the subsistence, sport, and commercial fisheries.

(b) While the Nushagak River king salmon are listed as a stock of management concern, it is the intent of the board that all Nushagak District salmon stocks are managed conservatively through June 28 to protect Nushagak River king salmon, consistent with 5 AAC 39.222 (policy for the management of sustainable salmon fisheries).

(c) The department shall manage commercial fisheries in the Nushagak District as follows:

(1) to achieve an inriver run goal of 95,000 king salmon in the Nushagak River consistent with the Nushagak-Mulchatna King Salmon Management Plan as described in 5 AAC 06.361(b)(1).

(2) when the Wood River sockeye salmon forecast or in season projection is less than 5,000,000 fish the department shall manage for the current sustainable escapement goal (SEG) of 700,000 to 1,800,000 fish;

(3) when the Wood River sockeye salmon forecast or inseason assessment of run size is greater than five million fish the department shall manage to achieve a Wood River sockeye salmon optimal escapement goal (OEG) of 700,000 fish to an upper bound that is up to 15 percent of the Wood River run size above the 1,800,000 fish upper bound of the SEG, based on the preseason forecast and in season assessment of run size;

(4) when the Nushagak River sockeye salmon forecast or inseason projection is less than 2,500,000 fish, the department shall manage for the current SEG of 370,000 to 900,000 fish;

(5) when the Nushagak River sockeye salmon forecast or inseason assessment of run size is greater than 2,500,000 fish the department shall manage to achieve a Nushagak River sockeye salmon OEG of 370,000 fish to an upper bound that is up to 15 percent of the Nushagak run size above the 900,000 fish upper bound of the SEG, based on the preseason forecast and in season assessment of run size.

(d) Before 9:00 a.m. June 28, if the Nushagak king salmon inriver run size is projected to be less than 95,000 fish, the commissioner shall close, by emergency order, the sockeye salmon commercial drift gillnet fishery in the Nushagak District, and the sockeye salmon commercial set net fishery in the Nushagak Section of the Nushagak

District until

(1) the sockeye salmon sonar estimate in the Nushagak River is projected to exceed six percent of the Nushagak River sockeye salmon run based on the Nushagak River sockeye salmon preseason forecast and inseason assessment of run size; or

(2) the sockeye salmon count past the Wood River counting tower is projected to exceed 10 percent of the Wood River sockeye salmon run size based on the Wood River sockeye salmon preseason forecast and inseason assessment of run size.

(e) The department shall manage the sport fishery in the Nushagak River drainage, excluding the Wood River drainage, as follows:

(1) the annual limit for king salmon 20 inches or greater in length is four fish, of which only one fish may be 28 inches or greater in length;

(2) if the total inriver king salmon run return in the Nushagak River is projected to exceed 95,000 fish, the commissioner may, by emergency order, increase the annual limit for king salmon to four king salmon, 20 inches or greater in length, with no restrictions for fish over 28 inches in length.

(f) Subsistence fisheries will be managed in accordance with the rest of this title.

Notes

5 AAC 06.391
E!. 6/25/2023, Register 246, July 2023
Authority: AS 16.05.060
AS 16.05.251

Appendix B – 2023 Nushagak-Mulchatna King Salmon Management Plan.

5 AAC 06.361 – Nushagak-Mulchatna King Salmon Management Plan

(a) The purpose of this management plan is to ensure biological spawning escapement requirements of king salmon into the Nushagak-Mulchatna river systems. It is the intent of the Alaska Board of Fisheries (board) that Nushagak-Mulchatna king salmon be harvested in the fisheries that have historically harvested them. This management plan provides guidelines to the department to preclude allocation conflicts between the various users of this resource. The department shall manage Nushagak-Mulchatna king salmon stocks in a conservative manner consistent with sustained yield principles and the subsistence priority. Additionally, the department shall manage the Nushagak fisheries for the following management measures:

(1) to provide consistent sport fishing opportunity within and among seasons, including a level of inriver abundance as a given year's run timing allows, and a predictably open season;

(2) to provide a directed commercial king salmon fishery when surplus is available;

(3) to minimize disruptions to the commercial sockeye salmon fishery;

(4) to provide reasonable opportunity for subsistence harvest of king salmon;

(5) to ensure the subsistence fishery is the last fishery restricted or closed;

(6) to achieve escapement goals for all species in the district;

(7) to maintain a representation of age classes in the escapement similar to the run.

(b) The department shall manage the commercial and sport fisheries in the Nushagak District as follows:

(1) to achieve an inriver goal of 95,000 king salmon present in the Nushagak River upstream from the department sonar counter; the inriver goal provides for

(A) a biological escapement goal of 55,000 - 120,000 fish;

(B) reasonable opportunity for subsistence harvest of king salmon; and

(C) a king salmon sport fishery guideline harvest level of 5,000 fish, 20 inches or greater in length;

(2) in order to maintain a natural representation of age classes in the escapement, the department shall attempt to schedule commercial openings to provide pulses of fish into the river that have not been subject to harvest by commercial gear;

(3) the department may close the commercial drift or set gillnet fishery if the harvest in the directed commercial king salmon fishery for either gear group is more than two sockeye salmon for every one king salmon;

(4) consistent with 5 AAC 06.367 (Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan), to conserve king salmon the department shall manage for sockeye escapements in the Nushagak District to fall within

(A) the lower half of each river's sockeye salmon escapement goal range when the Wood River sockeye salmon run is 5,000,000 fish or less and the Nushagak sockeye salmon run is 2,500,000 fish or less; or

(B) the upper half of each river's sockeye salmon escapement goal range when the Wood River sockeye salmon run is greater than 5,000,000 fish or the Nushagak sockeye salmon run is greater than 2,500,000 fish based on the preseason forecast and inseason assessment of run size;

(5) beginning June 25, the department shall consider when evaluating the total run of sockeye salmon to the Nushagak District all possible data sources including the preseason forecast, Port Moller test fishery indices, including stock and age composition, total catch and effort to date, age composition of catch and effort data, and district test fishing;

(6) from June 1 through June 30, the department shall, in an attempt to conserve king salmon and to the extent practicable, conduct a gillnet test fishery to assess the abundance of sockeye and king salmon before opening by emergency order a fishing period directed at sockeye salmon.

(c) If the total inriver king salmon return in the Nushagak River is projected to exceed 95,000 fish, the guideline harvest level described in (b)(1)(C) of this section does not apply and the department shall consider opening a directed commercial king salmon fishery.

(d) If the spawning escapement of king salmon in the Nushagak River is projected to be more than 55,000 fish and the projected inriver return is less than 95,000 fish, the commissioner

(1) shall close, by emergency order, the directed king salmon commercial fishery in the Nushagak District; during a closure under this paragraph, the use of a commercial gillnet with webbing larger than five and one-half inches in another commercial salmon fishery is prohibited;

(2) repealed 5/31/2019;

(3) repealed 5/31/2019;

(e) If the spawning escapement of king salmon in the Nushagak River is projected to be less than 55,000 fish, the commissioner

(1) shall close, by emergency order, the sockeye salmon commercial fishery in the Nushagak District until the projected sockeye salmon escapement into the Wood River exceeds 100,000 fish;

(2) shall restrict to catch-and-release, by emergency order, the sport fishery directed for king salmon in the Nushagak River and prohibit the use of bait for fishing for all species of fish until the end of the king salmon season specified in 5 AAC 67.020 and 5 AAC 67.022(g); and

(3) may establish, by emergency order, fishing periods during which the time or area is reduced for the inriver king salmon subsistence fishery in the Nushagak River.

(f) Notwithstanding 5 AAC 06.200, in a directed king salmon commercial fishery, the southern boundary of the Nushagak District is a line from an ADF&G regulatory marker located at Etolin Point at 58º 39.37' N. lat., 158º 19.31' W. long., to 58º 33.92' N. lat., 158º 24.94' W. long. to Protection Point at 58º 29.27' N. lat., 158º 41.78' W. long.

(g) During a directed king salmon commercial fishery in the Nushagak District, drift gillnet and set gillnet fishing periods will be of equal length, but do not have to be open concurrently.

Notes

5 AAC 06.361

Eff. 6/19/92, Register 122; am 4/9/95, Register 134; am 5/14/98, Register 146; am 6/3/2001, Register 158; am 7/8/2001, Register 159; am 4/9/2004, Register 170; am 3/30/2007, Register 181; am 4/4/2013, Register 206; am 8/27/2016, Register 219, October 2016; am 5/31/2019, Register 230, May 2019; am 6/25/2023, Register 246, July 2023

Authority: AS 16.05.060

AS 16.05.251

Appendix C – Actual vs hypothetical fishery opening dates and key cumulative escapement estimates, 2023-2025.

	Actual (Current Plan)					Hypothetical (Previous Plan)				
			Cumulative Escapement Estimates					Cumulative Escapement Estimates		
			Nushagak River		Wood River			Nushagak River		Wood River
Date	Fishery Announce-ment (Time)	Fishery Opening (Time)	King Salmon	Sockeye Salmon	Sockeye Salmon	Fishery Announce-ment (Time)	Fishery Opening (Time)	King Salmon	Sockeye Salmon	Sockeye Salmon
2023			**Start Triggers:**	**417,000**	**801,000**					**100,000**
21-Jun			10,426	31,365	11,682			10,426	31,365	11,682
22-Jun			10,677	126,504	103,506	AM	PM	10,677	126,504	103,506
23-Jun			10,698	198,580	192,108			10,698	198,580	**192,108**
24-Jun			12,720	261,405	279,564			**12,720**	**261,405**	279,564
25-Jun	9:00	19:00	18,038	517,698	623,370			18,038	517,698	623,370
26-Jun			18,690	768,872	**1,053,426**			18,690	768,872	1,053,426
27-Jun			**21,024**	**887,215**	1,378,728			21,024	887,215	1,378,728
2024			**Start Triggers:**	**210,000**	**784,000**					**100,000**
20-Jun			7,209	51,170	88,890	PM		7,209	51,170	88,890
21-Jun			8,864	72,514	122,220		AM	8,864	72,514	**122,220**
22-Jun			8,984	88,347	142,116			**8,984**	**88,347**	142,116
23-Jun			9,723	92,389	153,684			9,723	92,389	153,684
24-Jun			10,236	93,149	156,852			10,236	93,149	156,852
25-Jun			10,997	100,524	190,602			10,997	100,524	190,602
26-Jun	9:00	16:30	12,454	392,765	435,024			12,454	392,765	435,024
27-Jun			15,248	639,670	**913,428**			15,248	639,670	913,428
28-Jun			**19,778**	**795,391**	1,485,138			19,778	795,391	1,485,138
2025			**Start Triggers:**	**635,000**	**763,000**					**100,000**
19-Jun			6,529	402,272	83,454	PM		6,529	402,272	83,454
20-Jun			6,645	457,559	113,382		AM	6,645	457,559	**113,382**
21-Jun	12:00		9,766	755,683	308,556			**9,766**	**755,683**	308,556
22-Jun		9:00	15,517	1,227,017	**619,752**			15,517	1,227,017	619,752
23-Jun			**16,227**	**1,480,862**	797,922			16,227	1,480,862	797,922

Key:

1. Shaded cells represent actual and hypothetical fishery announcement and opening dates for visual reference.
2. **Bolded** escapement estimates represent the best estimate of cumulative passage above the district at the fishery opening time. These were identified by adding assumed travel time (12-24 hours for Wood River and 36-48 hours for Nushagak River stocks) to the fishery opening time.
3. Outlined cells represent the escapement that met or exceeded the start trigger for that year and stock, based on the 2023 SOC Management Plan and annual Bristol Bay Salmon Forecast.

Sources: Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Appendix D - Inshore catch, escapement, total run and harvest rate for sockeye salmon in the Nushagak District, 2007-2025.

Year	Catch	Escapement	Total Run	Harvest Rate
2007	8,404,532	2,461,579	10,866,111	77%
2008	6,903,367	3,271,926	10,175,293	68%
2009	7,731,518	2,317,569	10,049,087	77%
2010	8,424,702	2,818,215	11,242,917	75%
2011	4,887,305	1,968,744	6,856,049	71%
2012	2,663,014	1,392,410	4,055,424	66%
2013	3,163,805	2,466,552	5,630,357	56%
2014	6,447,650	3,723,681	10,171,331	63%
2015	5,593,702	3,389,294	8,982,996	62%
2016	8,886,077	2,459,450	11,345,527	78%
2017	12,322,519	7,705,230	20,027,749	62%
2018	24,230,150	9,525,486	33,755,636	72%
2019	14,755,905	3,038,699	17,794,604	83%
2020	8,860,302	3,795,759	12,656,061	70%
2021	18,283,479	9,986,407	28,269,886	65%
2022	22,718,969	7,581,652	30,300,621	75%
2023	11,967,229	4,963,788	16,931,017	71%
2024	12,300,233	6,820,614	19,120,847	64%
2025	16,596,415	6,585,886	23,182,301	72%
2007 - 2016	6,310,567	2,626,942	8,937,509	69%
2017 - 2019	17,102,858	6,756,472	23,859,330	72%
2023 - 2025	13,621,292	6,123,429	19,744,722	69%

Sources: Elison et al. (2025); ADF&G (2025).

Appendix E – Number of hours per day opened to drift net fishing for selected years.

Date	2017	2018	2019	2023	2024	2025
18-Jun						
19-Jun						
20-Jun		5	1			
21-Jun		5	8.5			
22-Jun	10	4.5	10.5			4
23-Jun	14	5	10			9
24-Jun	17	8.5	10			7.5
25-Jun	24	16	11.5	4		16
26-Jun	24	24	12	8.5	6	7
27-Jun	24	22.5	13	6.5	8	9.5
28-Jun	24	16.5	10	14.5	10	10
29-Jun	19	15	12	10.5	10	14.5
30-Jun	12	16	15.5	10	12	11.5
1-Jul	15	16.5	17	13	11.5	24
2-Jul	14	16.5	16	14.5	9.5	16.5
3-Jul	24	16.5	18.5	8	12.5	14
4-Jul	18	17.5	16.5	17.5	23.5	15
5-Jul	24	17.5	18	24	24	15
6-Jul	24	18	14.5	23	23	15.5
7-Jul	24	17.5	16	15	15.5	16.5
8-Jul	24	21.5	13	19.5	15.5	17
9-Jul	24	21	11	24	19	17.5
10-Jul	24	18	11	24	24	17.5
11-Jul	24	18	11.5	24	24	22.5
12-Jul	24	21	15.5	24	24	24
13-Jul	24	19	16	24	24	24
14-Jul	24	19	16	24	24	24
15-Jul	24	19	16	24	24	24
16-Jul	24	20.5	17.5	24	24	24
17-Jul	24	24	24	24	24	24
18-Jul	24	24	24	24	24	24
19-Jul	24	24	24	24	24	24
20-Jul	24	24	24	24	24	24
Means						
20-Jun - 25-Jun	16.3	7.3	8.6	4.0		9.1
26-Jun - 30-Jun	20.6	18.8	12.5	10.0	9.2	10.5
1-Jul - 5-Jul	19.0	16.9	17.2	15.4	16.2	16.9
6-Jul - 10-Jul	24.0	19.2	13.1	21.1	19.4	16.8

Sources: Elison et al. (2018), Salomone et al, (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Appendix F – Number of hours per day opened to set net fishing for selected years.

Date	2017	2018	2019	2023	2024	2025
18-Jun						
19-Jun		6				
20-Jun		18.25	8.5			
21-Jun	1.5	18	19.5			
22-Jun	19.5	17.5	19.5			8
23-Jun	24	17.75	13			11
24-Jun	24	17	24			10
25-Jun	24	24	24	5		20
26-Jun	24	24	24	13	7.5	8.5
27-Jun	24	24	24	9	11	13.5
28-Jun	24	24	24	16	12.5	13.5
29-Jun	24	24	24	17	12	20.5
30-Jun	24	24	24	13	14	14
1-Jul	24	24	24	19	14	24
2-Jul	24	24	24	24	15	17.5
3-Jul	24	24	24	11	18	19
4-Jul	14	24	24	23	24	24
5-Jul	24	24	24	24	24	24
6-Jul	24	24	24	24	24	24
7-Jul	24	24	24	24	24	24
8-Jul	24	24	24	24	24	24
9-Jul	24	24	24	24	24	24
10-Jul	24	24	24	24	24	24
11-Jul	24	24	24	24	24	24
12-Jul	24	24	24	24	24	24
13-Jul	24	24	24	24	24	24
14-Jul	24	24	24	24	24	24
15-Jul	24	24	24	24	24	24
16-Jul	24	24	24	24	24	24
17-Jul	24	24	24	24	24	24
18-Jul	24	24	24	24	24	24
19-Jul	24	24	24	24	24	24
20-Jul	24	24	24	24	24	24
Means						
20-Jun - 25-Jun	18.6	18.8	18.1	5.0		12.3
26-Jun - 30-Jun	24.0	24.0	24.0	13.6	11.4	14.0
1-Jul - 5-Jul	22.0	24.0	24.0	20.2	19.0	21.7
6-Jul - 10-Jul	24.0	24.0	24.0	24.0	24.0	24.0

Sources: Elison et al. (2018), Salomone et al, (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Appendix G – Comparison of Actual Vs. Hypothetical management objectives under the New SOC Management Plan vs. the old NMKS Management Plan (All Numbers are in Millions of Sockeye).

		Wood River			Nushagak River			Combined (Wood & Nushagak)			
		2023	2024	2025	2023	2024	2025	2023	2024	2025	Ave. 23-25
Hypothetical (Managed under old plan)	Fishing Start Date							22-Jun	21-Jun	20-Jun	21-Jun
	Fish past District at Start of Fishing	0.19	0.12	0.11	0.26	0.09	0.76	0.45	0.21	0.87	0.51
	Season Total Escapement [1]	1.8	1.8	1.8	0.9	0.9	0.9	2.70	2.70	2.70	2.70
	Escapement after Start of Fishing [2]	1.61	1.68	1.69	0.64	0.81	0.15	2.25	2.49	1.83	2.19
Actual (Managed under SOC plan)	Fishing Start Date							25-Jun	26-Jun	22-Jun	24-Jun
	Fish past District at Start of Fishing	1.05	0.91	0.62	0.89	0.80	1.48	1.94	1.71	2.10	1.92
	Season Total Escapement	2.649	4.405	2.657	1.773	1.723	3.261	4.42	6.13	5.92	5.49
	Escapement after Start of Fishing [2]	1.60	3.49	2.04	0.89	0.93	1.78	2.48	4.42	3.82	3.57
Comparison (Managed under Old Plan Vs. SOC Management Plan)	Difference In Start Date (Delay)							-3 days	-5 days	-2 days	-3.3 days
	Additional Sockeye Esc. due to Triggers [3]	0.86	0.79	0.51	0.63	0.71	0.73	1.49	1.50	1.23	1.41
	Additional Sockeye Esc. After Start of Fishing [4]	(0.01)	1.81	0.35	0.25	0.12	1.64	0.23	1.93	1.99	1.38
	Total Extra Sockeye Escapement [5]	0.85	2.61	0.86	0.87	0.82	2.36	1.72	3.43	3.22	2.79
	% of Additional Esc. Resulting from Triggers [6]	101%	30%	59%	72%	86%	31%	86%	44%	38%	56%
	% of Additional Esc. Resulting from Late Season [7]	-1%	70%	41%	28%	14%	69%	14%	56%	62%	44%

[1] For the Hypothetical Scenario the top end of the SEG was used as the escapement number as to assume the manager hit the objectives of the plan of meeting the escapement goal.

[2] Escapement after start of fishing represents the total escapement minus the fish past the district when fishing started.

[3] This is the difference in the fish past the district between the actual start date using the SOC plan and the hypothetical start date under the old management plan.

[4] Difference between Escapement after start of fishing from the actual fishery managed under the SOC management plan and the hypothetical escapement after start of fishing if the fishery had been managed according to the old plan and stayed within the top end of the SEG.

[5] This is the total sockeye escapement that went above the top end of the SEG.

[6] This represents the percent of additional sockeye escapement above the SEG that likely was a result of the delayed start to fishing due to the Triggers in the SOC Management Plan. It was calculated by dividing the additional sockeye due to triggers by the total extra sockeye escapement.

[7] This represents the percent of additional sockeye escapement above the SEG that likely was a result of management actions taken after the commercial fishery was open. It was calculated by dividing the additional sockeye esc. after start of fishing by the total extra sockeye escapement.

NOTE: it is important to recognize that this analysis rests on several assumptions. First, we likely overestimated the conservation benefits of the start triggers. If the fishery had opened earlier, not all of the fish estimated to have passed would have been harvested, since harvest rates are always less than 100 percent; some portion of those fish would have escaped upriver regardless. At the same time, the analysis also assumes that under the old management plan scenario, managers could have held escapements within the SEG targets. If that had not been possible, then we likely overestimated the conservation benefits attributed to later-season closure periods.

PC33

Submitted by: Luke Brockmann
Community of Residence: Juneau, ak

i am writing in support of this proposition. disrupts of a fish's natural feeding habits is something that should not be allowed. i think anyone can see, this is a gross violation of any sort of "fair chase". it has the potential to negatively impact native fish populations by attracting them to areas they otherwise would not frequent for food. this practice is very un-sportsman like and i feel should be outright banned. this, i believe, is a excellent first step to help keep wild fish wild.

PC33

Submitted by: Luke Brockmann
Community of Residence: Juneau, ak

i am writing in support of this proposal. because this fishery is primarily catch and release, i feel this proposal makes complete sense. there is an overwhelming amount of evidence showing that barbless hooks cause less damage to fish than barbed hooks. i feel this proposal will help ensure the health and longevity of the fisheries its applied to.

PC34

Submitted by: Jon Broderick
Community of Residence: Cannon Beach OR

I am a Nushagak setnetter opposed to Proposition 60 which would increase the legal limit of setnets in the Wood River Special Harvest Area from 25 fathoms to 37.5 fathoms.

The WRSHA is small. The proposal favors those who secure the first several sites at the WRSHA line, which are already the most successful and it disfavors the many setnetters behind these.

I also oppose proposals that would interrupt the current Nushagak King Salmon Stock of Concern Management Plan before completing seven years of implementation across a full generation of King salmon runs. It might be working fine.

PC35

Submitted by: Bradley Brophy
Community of Residence: Nevada

Hi, my name is Brad. My family has been fishing in Bristol Bay for nearly 20 years. I would personally like to strongly oppose proposals 61 - 68. Taking control out of the hands of the biologists and using an arbitrary date is dangerous to the fishery and would have huge economic impacts on the Bristol Bay fleet.

PC36

Submitted by: Dawn Brophy

Community of Residence: Nevada

Hi, my name is Dawn. I would like to oppose proposals 61 - 68. Lets see the current management plan go through a full cycle before we adopt extreme measures that would have great economic impacts on not only Nushagak fisherman but the entire Bristol Bay fleet.

PC37

Submitted by: Samuel Brophy
Community of Residence: Naknek

As a long time Bristol Bay fisherman(more specifically Nushigak fisherman), I strongly oppose proposal 61 as it has severe negative impact on myself and all other Bristol Bay fisherman who rely on this fishery to make a living for themselves and their families. I have complete trust in our biologists to manage this fishery properly, and this proposal takes it out of the biologists hands completely, and could cause severe negative impact to the future of the sockeye salmon run in the Nushigak district.

PC38

Submitted by: Zachary Brophy
Community of Residence: Washington

As a long time Bristol Bay fisherman and vessel owner. I would like to oppose propositions 61-68. Proposition 61 specifically limits valuable fishing time in the Nushagak district with little to no scientific backing. We have already seen substantial king salmon management changes go into affect and we need to allow enough time to see the outcome. This also puts the Nushagak district at risk and provides limited ability to manage the escapement during the early part of the season, I trust the biologists discretion in management of the district. I feel that this could also cause an imbalance of boat counts throughout the bay and have negative impacts on other districts.

PC39

Submitted by: Corey Brost
Community of Residence: Spearfish

Bristol Bay Fisherman For 45 years. Oppose Proposals 44, 61-68 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.

PC39

Submitted by: Corey Brost
Community of Residence: Spearfish SD

In Favor.

PC40

Submitted by: Rhett Buchanan
Community of Residence: Wasilla, Alaska

I'm writing in support of Proposal 48. As a long-time drift boat deckhand, I witnessed how set net site gear interferes with a drift boat's ability to effectively fish near shore, which this proposal addresses in a way that would benefit drift gillnet boats. As a current Kvichak set net permit holder, I appreciate how this proposal would equitably provide proportional harvest opportunities for both gear groups. Note: If Proposal 48 is not passed, I would then support Proposal 49.

PC41

Submitted by: Robert Buchmayr
Community of Residence: Shoreline, wa

Proposal 57

I am against this proposal for the following reason:

Every drift boat fishing always avoids set net gear as it is, getting entangled with a set net has serious consequences for the drift boat in lost fishing time, lost gear and possible danger to crew. There is no need for new regulations to prevent this, current regulations and the penalty of lost fishing time and gear are enough of a deterrent. I also am against the wording of not fishing shoreward of any bouy , current regulations specify the distance from a set net, which makes sense, many time there are no set nets fishing but the bouys are still out, usually for the entire season whether the site is being fished or not. I believe current regulations are specific enough to separate set nets from drift boats and allow harvesting opportunities for both groups. The penalty for a drift boat that gets entangled with a set net anchor can ran into the thousands of dollars in missed opportunities, for that alone every drift boat does everything they can to not get entangled.

PC41

Submitted by: Robert Buchmayr
Community of Residence: Shoreline

I am in opposition to any changes in the stock of concern plan at this time

If changes are made they must be conservation efforts across user groups not isolated users

The plan has only been in place one board cycle which is an insufficient amount of time to gauge true long term benefit when a chinook life cycle is 7 years so I’m advocating for no changes so is the AC and BBSRI

PC42

Submitted by: Marion Burgraff
Community of Residence: King salmon

I appose the date changes of this proposal we will over escape the sockeye runs that late of a season start will force boat out of the district. I for one do not catch kings in my small drift gear. A few Jack'king salmon the sport fisheries impact the run more the drift fleet.

PC43

Submitted by: Spencer Burnfield
Community of Residence: Soldotna, Ak

Prop 61:

I oppose this proposal. There has not been time in the life cycle of king salmon to see any practical effects of the original proposal that was adopted in 2022. Looking at the data on commercial catch of kings before and after the proposal took effect there has been a measurable drop in the percentage of kings caught by commercial fishermen in the district. Whether that drop is significant or not is debatable, but the current data does show a decline which shows there has been some positive effects of the new regulations already. Furthermore we are, on average, quite close to the old bottom end minimum escapement over recent years. Which shows that at some point in the established science it was thought probable that king salmon stocks could decline to the current level. Upping the lower end escapement to it's current mark makes the decline look more stark. I'm not saying it isn't a concern. But sometimes helping one species can be detrimental to another. We are helping kings under the current plan. Let's not do too much too soon before we know if what we are currently doing is effective.

Prop 62:

I oppose this proposal. There has not been time in the life cycle of king salmon to see any practical effects of the original proposal that was adopted in 2022. Looking at the data on commercial catch of kings before and after the proposal took effect there has been a measurable drop in the percentage of kings caught by commercial fishermen in the district. Whether that drop is significant or not is debatable, but the current data does show a decline which shows there has been some positive effects of the new regulations already. Furthermore we are, on average, quite close to the old bottom end minimum escapement over recent years. Which shows that at some point in the established science it was thought probable that king salmon stocks could decline to the current level. Upping the lower end escapement to it's current mark makes the decline look more stark. I'm not saying it isn't a concern. But sometimes helping one species can be detrimental to another. We are helping kings under the current plan. Let's not do too much too soon before we know if what we are currently doing is effective.

PC44

Submitted by: Colton Campitelli
Community of Residence: Alaska

To whom it may concern. I am a bristol bay fisherman and would like to strongly oppose proposals 61-68. Proposal 61 setting a specific date for Nushagak fishing start date for the drift fleet takes all control of the fishery out of the biologists hands and puts it into a proposal submitted with no evidence that it will work. The negative financial impacts this would have on myself and fellow fisherman and all of families would be a great price to pay for a very low probability roll of the dice.

CANFISCO GROUP USA
A Division of the Jim Pattison Group

December 29, 2025

Ms. Märit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Canfisco Group Comments on Proposals 61-62, 92, & 94

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

The Canfisco Group comprises several seafood processing companies united by common ownership and purpose. Our group operates 11 seafood processing plants in Bristol Bay, Kenai, Kodiak, Yakutat, Sitka, and Ketchikan, employing 3,500 workers and supporting 1,750 fishermen each year. Our Bristol Bay operations include Alaska General Seafoods in Naknek, E&E Foods in Egigek, North Pacific Seafoods in Togiak and Naknek, and Leader Creek Fisheries in Naknek.

Proposals 61 and 62, Canfisco Group is opposed to setting a fixed date and Chinook salmon abundance trigger for management of the commercial fishery in the Nushagak District, and limiting the number of hours for the commercial fishery to no more than 12 hours per day from June 28 through July 4. We support retaining the current *Nushagak District King Salmon Stock of Concern Management Plan* given its success in reducing commercial exploitation of Chinook salmon and achieving additional Chinook escapement.

Staff comments show the exploitation rate of Chinook salmon by the commercial fleet decreased to 10% in the years of the SOC Management Plan, compared to 23% prior to 2023[1]. Further, population indicators and Table 1 from the ADF&G Nushagak River Chinook Salmon Stock Status report show that the average commercial harvest of Chinook in the last three years of the management plan decreased by 86% compared to the 20-average from 2003-2022[2].

Table 61-2 from page 14 of staff comments highlights ADF&G's conservative management under the SOC Management Plan each year, they opted to open the district 2-5 days later than the plan would have allowed by waiting until the Nushagak River trigger was met, despite the plan allowing ADF&G to open the district when the Nushagak and Wood River triggers are *projected* to be met. Further, it shows this cautious management passed 7,982 to 11,190 additional Chinook per year than the SOC Management Plan would have achieved. This amount of leeway for managers is appropriate as the SOC Management Plan was intended to provide the flexibility to manage Nushagak district salmon fisheries for the sustained yield of Chinook salmon stocks while allowing harvest opportunities for sockeye.

[1] ADF&G (Alaska Department of Fish and Game). 2025. Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals, Committee of the Whole–Groups 1–4 for Bristol Bay finfish, Alaska Board of Fisheries meeting, Anchorage, Alaska, January 13–18, 2026. Alaska Department of Fish and Game, Regional Information Report No. 5J25-05, Anchorage.

[2] Sands, T., C. Weaver, L. Borden, and L. Sills. 2025. Nushagak River Chinook salmon stock status 2023-2025: A report to the Alaska Board of Fisheries. Alaska Department of Fish and Game, Special Publication No. 25-18, Anchorage.

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

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

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

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

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

Management further errs on the side of conservation in their Chinook escapement counts due to the inability for the sonar to accurately account for Chinook in-river. ADF&G's hydroacoustic study from 2011 to 2014 estimated 47–65% of the Chinook salmon passed outside the ensonified zone[3]. And ADF&G's tagging mark and recapture study documented that in some years, 20–60% of Chinook salmon in the Nushagak River were not enumerated by the sonar[4]. The inability to account for all Chinook escapement is exacerbated in times of large sockeye runs, as seen in the last three years, as large schools of sockeye salmon passing in front of the sonar produces a 'shadowing' effect for the sonar.

When approved by the Board, the *Nushagak District King Salmon Stock of Concern Management Plan*, was intended to remain in effect until the Board undesignates the Stock of Concern. The management plan was not designed to rebuild Chinook stocks within one BOF regulatory cycle, given the 4-7-year lifecycle of Chinook salmon; rather, it is meant to reduce harvest pressure during periods of lower productivity. Changing the SOC Management Plan now, short of one or more Chinook salmon lifecycle, would create regulatory instability for those invested in the fishery and undermine the management success of the last three years.

In summary, the SOC Management Plan has delayed fishery openings, reduced fishing time, and increased Chinook and sockeye escapement. We ask you allow the SOC Management Plan to remain unchanged for an additional BOF regulatory cycle.

Proposal 92, Canfisco Group opposes closing the Naknek-Kvichak District on July 25th. Our operations usually stop buying fish on July 29th or later. We purchased fish as late in the year as we can, and the decision to stop buying is generally forced by vessels exiting the fishery. This early closure would result in lost opportunity for fishermen, processors, and the communities that depend on tax revenue.

[3] Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals

[4] Nushagak River Chinook salmon stock status 2023-2025

CANFISCO GROUP USA

A Division of the Jim Pattison Group

Proposal 94, we support removing the 48-hour maximum extension time for Togiak River Section management after July 16th. ADF&G comments note that controlling escapement has been difficult in recent years due to the current size of the fleet, which has been reduced from 44 permits in 2019 to 23 permits. Appendix A1 from ADF&G's 2024 Bristol Bay Annual Management Report shows 20 years of sockeye escapement by river system. Over the past 20 years, the lower bound of the Togiak River SEG has been met every year, and the upper bound of the goal has been exceeded in 5 of the last 6 years (2019-2024)[5].

Thank you for the opportunity to comment, we are happy to answer any questions.

Respectfully,

Megan O'Neil

Megan O'Neil
Director of Government Affairs
Petersburg, Alaska

[5] Elison, T., A. Tiernan, T. Sands, S. Vega, C. Weaver, and J. Terry-Shindelman. 2025. 2024 Bristol Bay annual management report. Alaska Department of Fish and Game, Fishery Management Report No. 25-17, Anchorage.

PC46

Submitted by: Alec Capps
Community of Residence: Oregon

Dear Board,

I have been Commercial Gillnetting (Setnet) in the Kvichak district for the last 7 years, 5 years as an owner/operator. I recognize that I am a visitor in this place (we live in Oregon). While we rely largely on the financial success of our business commercial fishing in Alaska, we also want to prioritize the people who call it home, and the future of the fishing industry for our children, should they choose to fish it. My family is greatly appreciative of the work you do.

PC47

Submitted by: Mark F. Carr
Ekuk Beach Fishermans Association
Community of Residence: Anchorage, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

To Whom It May Concern:

My name is Mark F. Carr, PhD and I am a fisherman on the Ekuk Beach in the Nushagak District. I have been doing this with my sister and her family for about 45 years, having held a permit and simply being a crew member. My own parents also owned and operated a setnet site on the Ekuk beach. 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. Please consider my following concerns:

1. 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.

2. 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.

3. 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. Every summer, literally every summer, while working our gear or just being on the beach, we watch drifters come within maybe ten feet of the shoreline, well inside our gear, while they set their own gear or just want to see if we're catching anything. Countless times over these 45 years we've seen our own and others' running lines cut by these Cretons. Please do something about it.

4. 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.

5. 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. From my perspective, this is a result of the now politicized reality facing our Fish & Game Biologist whose expertise, knowledge, and experience is overridden by some politician or political assignee from Juneau who doesn't know what he/she is doing. Please stop this.

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,

Mark F. Carr, PhD

Ekuk Beach, Nushagak District

PC48

Submitted by: Mike Carr
Community of Residence: Port Townsend, WA

Mike Carr, Bristol Bay drift fisherman and boat designer.

I oppose Proposals 61 and 62.

Reason: The triggers in the Nushagak king salmon management plan that is currently in place are for good reason an should not be discarded.

I support proposal 64.

Reason: Increased fishing opportunity in the Wood River Special Harvest Area should be considered while the greater Nushagak district is closed for king salmon escapement.

I oppose proposal 69.

Reason: It is redundant. The Nushagak district is already managed conservatively up to and passed the 28th of June.

I support proposals 75 and 76.

Reason: Allowing Dual permits vessels has been a benefit to those engaged in the Bristol Bay fishery, and allowing permit stacking would free up a regulatory obstacle to this beneficial practice.

I oppose proposal 81.

Reason: combining two permits permanently would have no benefits over allowing permit stacking and would cause economic obstacles that need not exist.

I Support Proposal 82.

Reason: The vessel specifications as they are written leave a huge amount of room for interpretation and is in need of clarification. Proposal 82 addresses this in a clear way while accommodating vessels that were built to a reasonable interpretation of the currant rules.

I support proposal 83.

Reason: Current conditions in the fishery make a longer vessel more beneficial than ever to fishermen. If longer vessels were allowed, new vessels could be built more cost effectively. This would contribute to better safety, better efficiency, and a better quality product.

Comments on Subsistence, Commercial, and Sport proposals for Bristol Bay Finfish Alaska Board of Fisheries Meeting, Anchorage Alaska January 13, 2026

Personal Comments Submitted by: Katherine Carscallen
December 29, 2025

Dear Board of Fisheries Members,

I am a lifelong resident of Dillingham, Alaska, a lifelong subsistence fisherman, 25 year commercial drift fisherman, S03T permit holder and captain, and a sportfish hobby fisherman as well. I am writing to provide personal testimony on several proposals before the board which would directly affect myself, my family and community. This will be the first Bristol Bay Board of Fisheries cycle I am not able to attend since my first in 2009. I very much believe in and appreciate the opportunity for the public to participate in this process and I hope you are able to consider my comments in your deliberation on the proposals below.

Proposal 44: [Reporting requirements. Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery ….] submitted by Kent Anderson, owner Alaska Salmon Camp Inc.

I am adamantly opposed to this proposal. Beyond simply implementing reporting requirements which are duplicative of existing practice, it proposes to limit subsistence catches of King salmon which should be prioritized over all other uses. Currently the Nushagak District is operating under a King Salmon Stock of Concern Management Plan. This plan was the result of collaboration between stakeholder groups, the State of Alaska, local AC's and science and research entities. To make piecemeal changes to the plan targeting certain user groups will not help identify or solve issues with King Salmon stocks and instead only increase animosity between user groups

Please take no action or oppose Proposal 44.

Proposal 61 [Nushagak District King Salmon Stock of Concern Management Plan…] Proposed by KRSA

I am opposed to this proposal. With insufficient time to evaluate the impact of the King Salmon Stock of Concern Management plan, making piecemeal changes to the plan targeting a specific user group are not warranted.

Please take no action or oppose proposal 61.

Proposal 62 [Nushagak District King Salmon Stock of Concern Management Plan…]
Proposed by: Kent Anderson, owner Alaska Salmon Camp Inc

I am opposed to this proposal. This proposal would create an inflexible start date for the commercial fishery and ignores the collaboration and effort put into the existing SOC Management Plan.
Please take no action or oppose proposal 62.

Proposal 63 [Nushagak District King Salmon Stock of Concern Management Plan…]
Proposed by: Nicholas Dowie and John O'Connor.

I am opposed to the adoption of this proposal. As stated regarding proposals 61 & 62 I believe piecemeal adaptations to the SOC Management Plan before adequate time is given to view impacts as well as explore other potential causes and explanations for the King Salmon decline are not advisable.

Please take no action or oppose Proposal 62.

Proposals 63-68 [Nushagak District King Salmon SOC Management Plan…]

Although I appreciate that there are some thoughtful solutions and ideas presented within some of these proposals, I believe it is necessary to allow the SOC management plan time to work. Please take no action on proposals 63-68.

General comments on Proposals 61-68 and 44: When considering proposed changes to the Nushagak King Salmon Stock of Concern Management Plan please consider the context of this plan and the problem as a whole. The plan was developed with collaboration between Bristol Bay's residents, representatives from stakeholder groups, the State of Alaska, local AC's and science and research entities. The plan was also developed with a recognition that impacts to king salmon from commercial harvest, subsistence or sport are not the lone causes of declines in king returns but with an effort to reach a balanced approach to reduce king harvest in the Nushagak as much as possible. I request that the board take no action on proposed changes in order to give the current plan time to work while also doing all you can to encourage an increase in research and analysis to determine the root cause or causes of Nushagak's king salmon decline. If we are forced to compartmentalize solutions for a problem that is no doubt interconnected, and definitely outside of the scope of the Bristol Bay management's reach we have little hope to solve the actual problems. The current SOC Management Plan represents compromises and a concerted effort to address the

problem within the scope of Bristol Bay's boundaries. I support that effort but with the knowledge that the impacts to Nushagak Kings extends beyond Bristol Bay's borders I would request that the Board write a letter to the Alaska Legislature acknowledging its own limitations to solve this problem and requesting increased and collaborative effort to better identify the full scope if impacts and causes of decline.

Proposal 54 [Nushagak River Coho Salmon Management Plan. Repeal the Nushagak River Coho Salmon Management Plan…]

I am opposed to this proposal as written as it incorrectly implies that the commercial coho salmon fishery has declined to the point of irrelevancy and states that "the department will not provide directed commercial fishing opportunities on Nushagak River coho salmon." At the outset this proposal appears to be a housekeeping style proposal seeking to align management with its own funding realities; however the final paragraph in the proposal amounts to a complete attack on an active and important fishery in the Nushagak District.

I have commercially harvested coho in the Nushagak district almost every other year for most of my 25 year fishing career. As a younger fisherman the coho fishery was a chance to keep fishing after the regular season, earn a higher crewshare as the only deckhand on board, take on more responsibilities and learn the fishery with lower stakes than the sockeye season. As a captain for the past 15 years the fishery has provided me the opportunity to pad light seasons with an extra two weeks of fishing on top of an already completed sockeye season. It's offered opportunities for my crew to gain experience, earn a higher crew share, and extend a short Bristol Bay season out longer. Late season coho fishing provides opportunities for families to introduce younger deckhands to the trade with lower risk and provides valuable direct marketing opportunities regardless of processor participation.

Participants in the coho fishery generally live in the watershed or may not have other employment to hurry back to, making it that much more important as a fishing opportunity. The implication from ADF&G that because the majority of processors cease buying the fishery is no longer important is absolutely false. I harvested and sold coho in the Nushagak in 2024 and almost every other year going back as far as I can remember. The years I didn't fish were often due to the plan for management sounding unclear causing processors/buyers to leave. Every year with or without processors however the coho fishery offers opportunity for direct marketers to catch and distribute coho on their own.

It is true that having an escapement goal without counting to accurately assess how those goals are tracking does present a problem, however there is not a biological concern. While funding is tight I would ask the board to consider the lost revenue (tax, fishing earnings, industry support dollars, secondary and tertiary economic impact) to the state and local communities by not managing the fishery as intended (MSY) and how that impact stacks up to continuing an already in-place counting operation two additional weeks.

Please take no action or oppose Proposal 54.

Proposal 55 [Nushagak River Coho Salmon Management Plan. Repeal the Nushagak River Coho Salmon Management Plan…]

I am *more* in favor of this proposal over 54, however my objection remains to any implication that the coho fishery is irrelevant just because effort has decreased in recent years. I do support the concept of removing a target number if we are not counting to reach that target however of course a preferred solution would be to extend the sonar through the peak of the coho run. Even without these counts, ADF&G has clarified that they can and will manage the subsistence, sport, and commercial fisheries effectively in the absence of escapement goals and the management plan.

Please support Proposal 55 as written and take care to ensure the intent of this proposal as a housekeeping measure only is honored throughout the proposal process.

Proposal 71, Proposal 72, Proposal 73 & Proposal 74 [Re-establish a General District ...] Proposed by: Joel A Ludwig, David Vardy, George Wilson and Doug Morgan

I am opposed to this proposal. The solution to fishermen breaking existing rules should not be to liberalize the rules. I agree with the proposers' complaint that the lack of enforcement leads to a situation at the lines which rewards illegal fishing. The solution to that is not to get rid of the line, it is enforcement of the line.

Please take no action or oppose Proposals 71-74

While I oppose the proposal to recreate a General District, I completely agree with the proposers' conclusion that the lack of enforcement late season makes it difficult to fish some areas while competing with illegal fishing. With dramatic improvements in technology in recent years I would urge the board to consider making a recommendation to expand options for enforcement which allow for steady and visible enforcement of the lines. Infrequent enforcement or sting operations actually continue to

reward illegal fishing further and punishes those of us who will not fish outside the boundaries. Consistent monitoring of the line through less expensive methods would restore a legal, competitive fishing boundary.

Proposal 75, Proposal 76, Proposal 77 & Proposal 78 [Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery…] Proposed by Justin Arnold, Abe Williams, Glenn Biernacki and Hayden Hinschied.

I am opposed to Proposal 75. The proposer mentions the benefits and increased entry into the fishery created by the current dual permit structure. The current structure allows for a deckhand to purchase a permit and partner with a vessel owner which has increased entrance into the fishery and created opportunities for deckhands. If the vessel owner was able to simply purchase a permit and stack on their own there would be less incentive to pay the higher crewshare currently earned by their deckhand. It would eliminate the mentorship opportunities created by the current dual system and result in a consolidation of permits into fewer vessel owners and create the ability to ‘buy’ a larger share of access to the fishery.
This issue has been thoroughly debated by past boards for two decades. The decision made with input from fleet and community members has been the correct one. Please uphold that decision and take no action or Oppose Proposals 75-78.

PC50

Submitted by: Floyd Carter
Togiak River Lodge
Community of Residence: Togiak

I support Proposal 102. The bulk of king salmon spawning on the Togiak occurs above the Pongo, and no lodges operate above that point. Moving the boundary to the Pongo is logical and will help streamline enforcement from Troopers”

PC51

Submitted by: Christopher Childs
Community of Residence: Maupin,OR

“I support Proposal 102. The bulk of king salmon spawning on the Togiak occurs above the Pongo, and no lodges operate above that point. Moving the boundary to the Pongo is logical and will help streamline enforcement from Troopers”

PC52

Submitted by: Jace Clayton
Community of Residence: Pahrump Nv

I oppose 61 through 68 because I think we should trust our biologists about our river and not some arbitrary regulations.

PC53

Submitted by: Jaxon Clayton
Community of Residence: Alaska

Hi, my name is Jaxon. I am a bristol bay vessel owner and permit holder. I am a Nushagak fisherman and I would like to strongly opposed proposal 61-68. Proposal 61 takes the decision making on the management of the river out of the biologists hands whom I trust to make the correct decisions for the longevity of the salmon runs. This would have great negative economic impacts on myself, my family and my fellow fisherman.

CFEC Permit Holdings and Estimates of Gross Earnings in the Bristol Bay Commercial Salmon Fisheries, 1975-2024

CFEC Report Number 25-07N,
December, 2025

Commercial Fisheries Entry Commission
8800 Glacier Highway #109
P.O. Box 110302
Juneau, Alaska 99811-0302
(907) 789-6160

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- (Statewide Telecommunication Device for the Deaf) 1-800-478-3648
- (Juneau TDD) 907-465-3646
- (FAX) 907-465-6078

For information on alternative formats and questions on this publication, please contact the following:

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Abstract

Limited entry permit holdings in both Bristol Bay salmon fisheries are examined in this report, beginning with the drift gillnet fishery and followed by a separate review of the set gillnet fishery. The report provides summary statistics on permit holdings; permanent and emergency transfers; permit values; permit latency; new entrants; median permit holder age; estimated gross earnings; and vessel characteristics for the drift gillnet fleet. It also summarizes Department of Natural Resources shore fishery leases and permit stacking in the set gillnet fishery, as well as dual-permit operations in the drift gillnet fishery. Selected statistics are additionally presented by resident type. A description of the data sources, computer files, and methods used to generate these statistics is included.

Prepared by Reid Johnson

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Introduction

Commercial fishing for salmon in Bristol Bay has been documented as far back as 1884.[1] Historically, many gear types have been employed to commercially harvest salmon in Bristol Bay, but today the two commercial salmon fisheries prosecuted in this region of Alaska include only the drift gillnet and set gillnet fisheries.

In 1972, Alaskan voters amended the state constitution to allow limited entry in the state's commercial fisheries. The following year, the Alaska State Legislature enacted the Limited Entry Act (AS 16.43), giving the Commercial Fisheries Entry Commission (CFEC) the authority to administer the program. Permit fisheries are defined by CFEC as a specific gear type for a fishery resource within a defined administrative area.

Both Bristol Bay salmon fisheries were part of the original group of 19 Alaska salmon fisheries that were limited after the Alaska legislature passed the limited entry act. Limited entry permits for Bristol Bay salmon drift gillnet (S03T) and Bristol Bay salmon set gillnet (S04T) were first issued in 1975.

Limited entry permits were allocated based upon an individual's past participation and economic dependence on the fishery. To allocate permits among qualified applicants, CFEC developed point systems to measure each individual's relative position in the fishery. The Limited Entry Act also required CFEC to determine levels within the point system where individuals would experience only minor economic hardship if excluded from an initial permit allocation. Persons who were ranked at or below the minor economic hardship level received non-transferable permits, while persons who were ranked above the minor economic hardship level received transferable permits. Among Bristol Bay salmon permit fisheries, non-transferable permits were only issued in the set gillnet fishery. CFEC permits are cancelled after two years of non-payment of annual fees. This frequently occurs when the permit holder reaches an age when fishing is no longer feasible, or when the permit holder passes away.

Beginning in the early 2000s, both Bristol Bay salmon fisheries experienced substantial economic pressure as ex-vessel prices declined due to global market changes and competition from farmed salmon. Despite harvests that generally tracked historical averages, profitability dropped, prompting CFEC to conduct the 2004 Optimum Number Study for the Bristol Bay drift gillnet fishery. That study concluded that, under early-2000s economic conditions, an economically efficient fleet would consist of roughly 800–1,200 drift permits, substantially fewer than the more than 1,800 plus permits issued. As prices remained low, the number of active vessels also declined, and once dual-permit operations were later authorized, the number of drift vessels fishing in Bristol Bay stabilized at a level slightly higher than the upper end of the study's optimum permit number range.

Regulatory responses to these economic conditions included the introduction of dual-permit operations in the drift gillnet fishery and permit stacking in the set gillnet fishery. Dual operations allow two permit holders to fish up to 200 fathoms of gear from a single vessel, and although the increase in allowable gear is modest, the economic efficiencies—from shared costs, more effective vessel deployment, and coordinated fishing effort—have led dual-permit vessels to earn substantially more than single-permit operations on average. In the set net fishery, permit stacking allowed two permits to be fished on a single operation, supporting family operations and improving economic viability. However, this authority sunset in 2012, after which set-net permit holders could no longer legally stack two permits on one site.

In more recent years, exceptionally strong sockeye runs—especially from 2018 through 2022—produced harvests well above long-term averages, though market conditions and processor limitations have muted some of the economic benefit. The COVID-19 pandemic further disrupted the fisheries by increasing operating and processing costs, reducing workforce availability, and contributing to volatile ex-vessel prices. These economic shifts reinforced the importance of efficiency-oriented measures such as dual-permit

[1] See Byerly, M., B. Brooks, B. Simonson, H. Savikko, and H.J. Geiger. *Alaska's Commercial Salmon Catches, 1878-1997*. RIR No. 5J99-05.

operations and influenced ongoing discussions about the long-term structure and economic sustainability of the Bristol Bay salmon fleet.

Information regarding season length, openings and closings, size, and other such data can be found in the Alaska Department of Fish and Game's Area Management Reports. This report focuses on the economics of these commercial fisheries. This report provides an overview of limited entry permit holdings and estimated gross earnings in the Bristol Bay commercial salmon fisheries.

ADF&G fish tickets identify, among other things, the species harvested. Salmon species on fish tickets are well documented for each of these fisheries. Variations do exist in the financial composition for each of the five major Pacific salmon species commercially harvested in Bristol Bay from year to year and across each fishery. Commercial harvest of species other than salmon were documented at extremely low rates so they are not displayed in Table 0-1.

Table 0-1. Percent of Total Ex-vessel Value of Bristol Bay Salmon Fisheries by Species, 1975-2024

Species	Area Wide	Bristol Bay Drift Gillnet	Bristol Bay Set Gillnet
Chinook	1.2%	1.2%	0.9%
Sockeye	96.1%	96.1%	96.3%
Coho	0.7%	0.6%	1.3%
Pink	0.4%	0.4%	0.5%
Chum	1.6%	1.7%	1.0%

Description of the Data Files Used to Generate This Report

Several CFEC data files were used to generate the statistics in this report: the gross earnings file, the permit file, the census file, the vessel file, ADF&G vessel registration data, and a DNR shore fishery lease data file. The most recent updated data is included in this report. The following is a brief description of each file. Please contact CFEC for more detail about these files if you are interested.

CFEC Gross Earnings File

The CFEC gross earnings file is based on ADF&G fish tickets and is augmented with CFEC permit holder and other data. The ex-vessel value for salmon in the CFEC gross earnings file largely come from the Commercial Operators Annual Report and ADF&G fish tickets with some additional information provided by processors. ADF&G salmon districts were mapped out from statistical areas using information provided by ADF&G. Several processes to validate and enhance fields such as vessel number and statistical area were undertaken to increase accuracy of this report. Starting in 2016, dual permit operations were identified using fish ticket identifiers.

CFEC Permit File

The CFEC permit file contains data on persons who hold or have held CFEC permits. It originates from CFEC permit renewal and permit transfer forms. The permit file contains a data field indicating the declared residency of permit holders as well as their addresses.

In this report, resident status is categorized into three resident types:

- ***Local*** *– permits held by persons residing locally to the ADF&G management area*
- ***Nonlocal*** *– permits held by persons who reside in Alaska outside of the ADF&G management area*
- ***Nonresidents*** *– permits held by persons who are not residents of Alaska*

CFEC Census File

CFEC maintains a computer file of places within Alaska where permit holders reside. Each community is annotated with information on its local or nonlocal status by permit fishery. Table 0-2 lists the communities that are currently designated as local to Bristol Bay salmon commercial fisheries in the Census file.

Table 0-2. Communities Local to the Bristol Bay Salmon Fisheries, as Indicated in the CFEC Census File

Aleknagik	Igiugig	Kvichak	Nunachuak	South Naknek
Cape Newenham	Igushik	Levelock	Nushagak	Togiak
Clarks Point	Iliamna	Manokotak	Pedro Bay	Twin Hills
Dillingham	Kashiagamiut	Nakeen	Pilot Point	Ugashik
Egegik	King Salmon	Naknek	Pope-Vannoy Ldg	Ungalikthluk
Ekuk	Koggiung	New Stuyahok	Port Alsworth	
Ekwok	Kokhanok	Newhalen	Port Heiden	
Hallersville	Koliganek	Nondalton	Portage Creek	

CFEC Vessel File

CFEC maintains a computer file of vessel registration data back to 1978. Commercial fishermen fill out a form and voluntarily provide data regarding the vessel they intend to use that fishing season.

ADF&G Bristol Bay Vessel Registration Data

Bristol Bay drift gillnet permit holders have registration requirements per 5 AAC 06.370 for much of the fishing season. These ADF&G registration records indicate if the permit holder is fishing by themselves, or jointly with another permit holder on the same vessel as a dual permit operation. The registration data for 2004 to 2015 was used to determine which permits were used in dual permit operations for what date. Because registration requirements do not fully encompass the entire fishing season in Bristol Bay, counts of dual permit operations may not be complete in every instance. Beginning in 2016, ADF&G fish tickets were changed to fully record dual permit operations. As such, ADF&G fish ticket data were used to determine which permits were used in dual permit operations starting in 2016.

DNR Shore Fishery Lease Data File

The DNR Land Administration System contains records used to maintain the DNR Shore Fishery Lease program. These records were merged with the CFEC permit file to create a dataset. Creation of the dataset is described in CFEC Report Number 25-04N, *CFEC Salmon Set Gillnet Permits and DNR Shore Fishery Leases in Prince William Sound, Cook Inlet, Kodiak, Alaska Peninsula, and Bristol Bay 1975-2024*.

Data Display

Percentages are rounded to the nearest tenth of a percent where displayed. Dollars are rounded to whole dollars. As such, rounded aggregates may appear to not total due to rounding. If you would like more precise figures, then please contact the CFEC research unit. Some counts will vary from previous research projects insofar as the data has been corrected and updated.

Chapter 1 Bristol Bay Salmon Drift Gillnet Fishery

S03T Permit Holdings

Limited entry permits for the Bristol Bay salmon drift gillnet fishery (S03T permits) were issued starting in 1975. CFEC has issued 1,875 S03T permits. Table 1-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 38.0% (712/1,875) of the permits, Nonlocal Alaskans received 22.3% (417/1,875) of the permits, and Nonresidents received 39.7% (746/1,875). Every permit issued in this fishery was a transferable permit.

Table 1-1. Initial Issuance and Year-end 2024 Totals of Bristol Bay Salmon Drift Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

	Initial Issues		Transfers		Migrations		Cancellations		2024 Year End	
Residency	Count	Percentage	Count	Percent Change	Count	Percent Change	Count	Percent Change	Count	Percent Change
Local	712	38.0%	-330	-46.3%	-92	-12.9%	4	0.6%	286	15.4%
Nonlocal	417	22.2%	219	52.5%	-63	-15.1%	1	0.2%	572	30.7%
Nonresident	746	39.8%	111	14.9%	155	20.8%	8	1.1%	1004	53.9%
Total	1875	100.0%	0	0.00%	0	0.0%	13	0.69%	1862	100.0%

The number of permits held by each resident type can change for three reasons: permits can be transferred to other resident types (transfer); permit holders can move from one location to another (migration); or permits can be cancelled (such as when a permit holder does not pay the renewal fee for two consecutive). This table indicates the extent to which these factors have contributed to net changes in permit holdings in this fishery.

Transfers of S03T Permits

Under the Limited Entry Act's terms of free transferability, permits may be sold, traded, given away, or inherited. CFEC requires the completion of a survey with each transfer. [2] The surveys provide information such as transfer acquisition methods, the relationship between individuals in the transaction, and the sale amount for instances when the permit is sold.

Table 1-2. Transfer Acquisition Methods for Bristol Bay Salmon Drift Gillnet Permits, 1980-2024

	Bristol Bay Salmon Drift Net		Combined Bristol Bay Salmon		Statewide Salmon Drift Gillnet		All Fisheries Statewide	
Acquisition Method	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	2,278	33.2%	4,345	39.5%	4,117	30.8%	14,341	33.0%
Sale	4,058	59.1%	5,878	53.4%	8,280	61.9%	25,299	58.2%
Trade	42	0.6%	68	0.6%	127	0.9%	541	1.2%
Other	483	7.0%	718	6.5%	855	6.4%	3,294	7.6%
Total	6,861	100.0%	11,009	100.0%	13,379	100.0%	43,475	100.0%

Table 1-2 compares transfer acquisition methods for the S03T permits, the combined Bristol Bay salmon permit types, statewide salmon drift gillnet permits, and all limited entry permits between 1980 and 2024. A third of all S03T permit transfers were gifts (2,278), more than half of all transfers were sales (4,058), and a smaller percentage were trades (42) or other (483). The annual acquisition methods for S03T permits can be viewed in a different publication.[3]

[2] CFEC implemented the transfer survey in 1980.

[3] See *Changes in the Distribution of Alaska's Commercial Fisheries Entry Permits, 1975-2024*, CFEC Report No. 25-03N.

Table 1-3. Relationships of Transferor to Transfer Recipients for Bristol Bay Salmon Drift Gillnet Permits, 1980-2024

	Bristol Bay Salmon Drift Net		Combined Bristol Bay Salmon		Statewide Salmon Drift Gillnet		All Fisheries Statewide	
Relationship	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	1,196	17.4%	2,179	19.8%	2,235	16.7%	8,189	18.8%
Member of Immediate Family	2,186	31.9%	3,841	34.9%	4,152	31.0%	14,586	33.6%
Other Relative	303	4.4%	594	5.4%	560	4.2%	1,938	4.5%
Other	3,176	46.3%	4,395	39.9%	6,432	48.1%	18,762	43.2%
Total	6,861	100.0%	11,009	100.0%	13,379	100.0%	43,475	100.0%

Table 1-3 shows the relationships between transferors and transfer recipients for S03T permits and compares S03T permit transfers with the combined Bristol Bay salmon permit types, statewide salmon drift gillnet permits, and all limited entry permits from 1980 to 2024. Transfers within the family, both immediate family members and other relatives, total 36.3% (2,489) of all transfers. This compares to 40.3% (4,435) for all Bristol Bay salmon permit types combined, 35.2% (4,712) for statewide salmon drift gillnet permits, and 38.1% (16,524) for all limited entry permits statewide.

Emergency Transfers of S03T Permits

Commercial landings can be made with either permanently held permits or with permits held temporarily through emergency transfers. Emergency transfers (ET) of permits are granted if illness, disability, death, required military or government service, or other unavoidable hardship of a temporary, unexpected, and unforeseen nature prevents the permanent permit holder from participating in the fishery. "Hardship" does not include the results of a permit holder's own economic decisions, or the results of economic, biological or regulatory variables which are normally part of the risk of doing business as a fisherman. At the end of the year, ET permits automatically revert to the permanent permit holder.

Table 1-4 shows the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. The percentage of individuals using an emergency transfer to participate in the S03T fishery has been consistently around 10 percent since the mid 1990's.

Table 1-4. Use of Emergency Transfer Permits in the Bristol Bay Salmon Drift Gillnet Fishery, 1975-2024

Year	Individuals With Landings	ET Permit Holders With Landings	Rate ET
1975	1252	34	2.7%
1976	1362	46	3.4%
1977	1363	44	3.2%
1978	1587	48	3.0%
1979	1731	57	3.3%
1980	1782	70	3.9%
1981	1812	85	4.7%
1982	1813	81	4.5%
1983	1818	71	3.9%
1984	1838	84	4.6%
1985	1834	90	4.9%
1986	1861	102	5.5%
1987	1863	128	6.9%
1988	1874	120	6.4%
1989	1889	111	5.9%
1990	1908	134	7.0%
1991	1900	149	7.8%
1992	1925	162	8.4%
1993	1931	202	10.5%
1994	1924	226	11.7%
1995	1928	209	10.8%
1996	1922	227	11.8%
1997	1914	233	12.2%
1998	1887	218	11.6%
1999	1876	214	11.4%
2000	1843	208	11.3%
2001	1577	172	10.9%
2002	1187	115	9.7%
2003	1432	148	10.3%
2004	1416	139	9.8%
2005	1459	144	9.9%
2006	1492	148	9.9%
2007	1481	140	9.5%
2008	1484	139	9.4%
2009	1453	152	10.5%
2010	1510	158	10.5%
2011	1548	164	10.6%
2012	1526	148	9.7%
2013	1500	164	10.9%
2014	1555	162	10.4%
2015	1559	151	9.7%
2016	1784	196	11.0%
2017	1790	197	11.0%
2018	1804	201	11.1%
2019	1860	199	10.7%
2020	1779	213	12.0%
2021	1809	207	11.4%
2022	1845	194	10.5%
2023	1746	180	10.3%
2024	1724	160	9.3%

Latent S03T Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they fish. Permits that are not used (don't record landings) each year are referred to herein as "latent" permits for that year.

Table 1-5 indicates the total number of viable S03T permits issued each year, the number of permits fished (with commercial landings), and the rate of permit latency. Viable permits include both interim entry and permanent permits. Note that for this table, in years when a single individual held an interim-entry permit and was also issued a permanent permit, only the permanent permit is counted. The yearly percentage of latency is depicted in Figure 1-1.

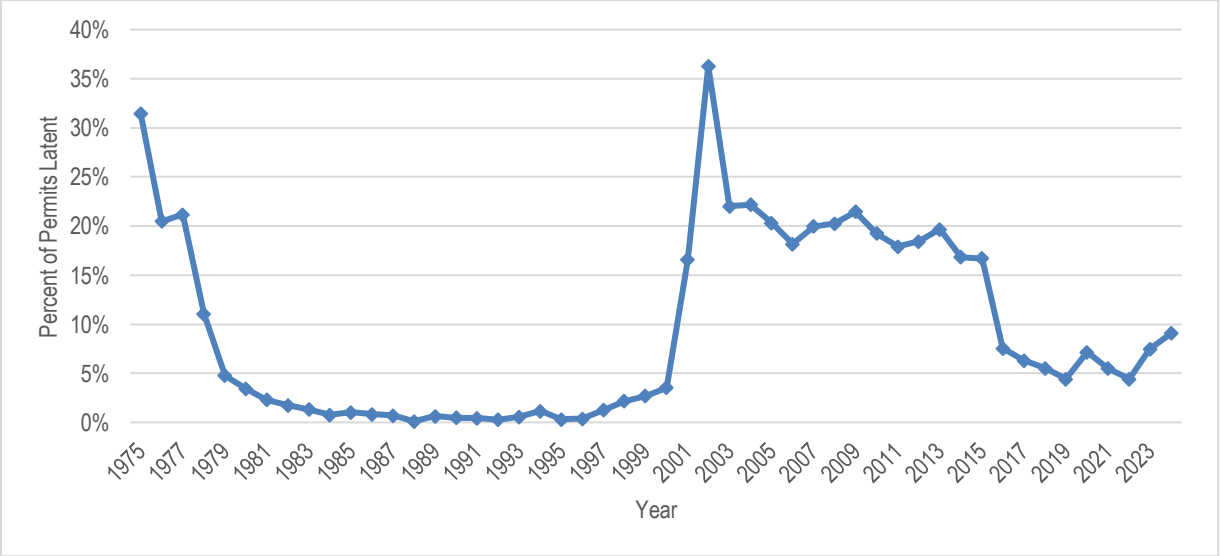
There are many reasons why an individual might not fish in any given year. This table and figure do not explain any of these reasons.

Table 1-5. Bristol Bay Salmon Drift Gillnet Permit Latency, 1975-2024

Year	Permits Issued	Permits Fished	Latency Rate
1975	1821	1249	31.4%
1976	1705	1356	20.5%
1977	1724	1359	21.2%
1978	1771	1575	11.1%
1979	1800	1714	4.8%
1980	1827	1764	3.4%
1981	1827	1785	2.3%
1982	1824	1792	1.8%
1983	1821	1797	1.3%
1984	1818	1804	0.8%
1985	1834	1815	1.0%
1986	1838	1823	0.8%
1987	1837	1824	0.7%
1988	1839	1837	0.1%
1989	1867	1855	0.6%
1990	1878	1869	0.5%
1991	1881	1873	0.4%
1992	1884	1879	0.3%
1993	1886	1875	0.6%
1994	1887	1865	1.2%
1995	1888	1882	0.3%
1996	1891	1884	0.4%
1997	1899	1875	1.3%
1998	1899	1858	2.2%
1999	1898	1847	2.7%
2000	1890	1823	3.5%
2001	1877	1566	16.6%
2002	1858	1184	36.3%
2003	1826	1424	22.0%
2004	1813	1411	22.2%
2005	1816	1447	20.3%
2006	1802	1475	18.1%
2007	1834	1468	20.0%
2008	1842	1469	20.2%
2009	1838	1444	21.4%
2010	1850	1494	19.2%
2011	1856	1524	17.9%
2012	1855	1513	18.4%
2013	1852	1488	19.7%
2014	1853	1541	16.8%
2015	1855	1545	16.7%
2016	1855	1715	7.5%
2017	1854	1737	6.3%
2018	1851	1749	5.5%
2019	1858	1776	4.4%
2020	1858	1725	7.2%
2021	1856	1754	5.5%
2022	1859	1777	4.4%
2023	1859	1720	7.5%
2024	1853	1685	9.1%

- *When an individual with an interim-entry permit is issued a permanent permit in the same year, only the permanent permit is counted in the above table.*
- *'Permits Fished' is the number of CFEC permits that were used to record commercial landings in that year.*

Figure 1-1. Bristol Bay Salmon Drift Gillnet Permit Latency Percentage, 1975-2024



New Entrants into the Bristol Bay Salmon Drift Gillnet Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S03T permit. It is important to note that initial permit holders are not considered new entrants because they needed a proven fishing history prior to 1975 in order to become an initial permit holder. Individuals who only make landings on an emergency transfer or interim-entry permit for any given year are not considered in this table.

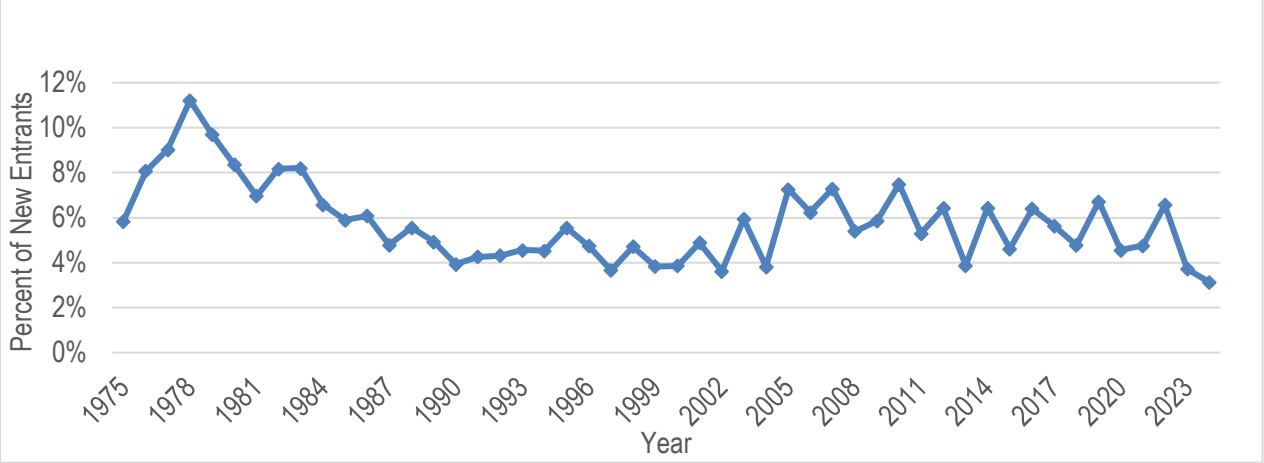
Table 1-6. New Entrants into the Bristol Bay Salmon Drift Gillnet Fishery, 1975-2024

Year	Individuals With Landings	New Entrants with Landings	% New Entrants
1975	1252	73	5.8%
1976	1362	110	8.1%
1977	1363	123	9.0%
1978	1587	178	11.2%
1979	1731	168	9.7%
1980	1782	149	8.4%
1981	1812	126	7.0%
1982	1813	148	8.2%
1983	1818	149	8.2%
1984	1838	121	6.6%
1985	1834	108	5.9%
1986	1861	113	6.1%
1987	1863	89	4.8%
1988	1874	104	5.5%
1989	1889	93	4.9%
1990	1908	75	3.9%
1991	1900	81	4.3%
1992	1925	83	4.3%
1993	1931	88	4.6%
1994	1924	87	4.5%
1995	1928	107	5.5%
1996	1922	91	4.7%
1997	1914	70	3.7%
1998	1887	89	4.7%
1999	1876	72	3.8%
2000	1843	71	3.9%
2001	1577	77	4.9%
2002	1187	43	3.6%
2003	1432	85	5.9%
2004	1416	54	3.8%
2005	1459	106	7.3%
2006	1492	93	6.2%
2007	1481	108	7.3%
2008	1484	80	5.4%
2009	1453	85	5.8%
2010	1510	113	7.5%
2011	1548	82	5.3%
2012	1526	98	6.4%
2013	1500	58	3.9%
2014	1555	100	6.4%
2015	1559	72	4.6%
2016	1784	114	6.4%
2017	1790	101	5.6%
2018	1804	86	4.8%
2019	1860	125	6.7%
2020	1779	81	4.6%
2021	1809	86	4.8%
2022	1845	121	6.6%
2023	1746	65	3.7%
2024	1724	54	3.1%

- *This table excludes individuals with interim-entry and emergency transfer permits.*
- *Regulations were passed in 2004 allowing for dual permit operations (indicated by line).*

Table 1-6 and Figure 1-2 describe individuals rather than permits. An individual may hold up to two permits in this fishery, but can only fish one of them. An individual may also hold one S03T permit one year, and then in subsequent years hold a different S03T permit. Likewise, individuals may enter and exit the fishery multiple times over the years. Individuals are only counted once as a new entrant and only in the year in which they made their first documented landing on a permanent permit. The number of new entrants in the S03T fishery has remained consistent at between 8 and 3 percent since the 1980's as illustrated in figure 2.

Figure 1-2. Rate of New Entrants into the Bristol Bay Salmon Drift Gillnet Fishery, 1975-2024



S03T Dual Permit Operations

The Alaska Board of Fisheries enacted 5 AAC 06.333 and 5 AAC 06.370, which allows for two Bristol Bay salmon drift gillnet permit holders to fish from a single vessel starting in 2004. These vessels are required to be marked with the letter D, and are colloquially called "D Boats". Vessels that operate in a dual configuration are allowed to deploy up to 200 fathoms of gear, which is an increase of 33.3% over the single permit allotment of gear, which is 150 fathoms. In 2004 a total of 108 vessels operated as D Boats (table 1). This number of D Boats has increased every year since 2004 (figure 1-4). In 2024 465 vessels operated as D Boats.

In order for two permit holders to fish aboard the same vessel, they must register with ADF&G in advance. Dual-permit operations do not require both permit holders to fish together for the entire season; it is common for vessels to begin the season fishing a single permit, register as a dual-permit ("D-Boat") operation during the peak of the run, and then finish the season fishing a single permit again; therefore, the vessel may count in both single and dual permit categories in table 1-7.

Figure 1-3. Bristol Bay Drift Gillnet Dual Fishing Permit Vessels, 2004 – 2024

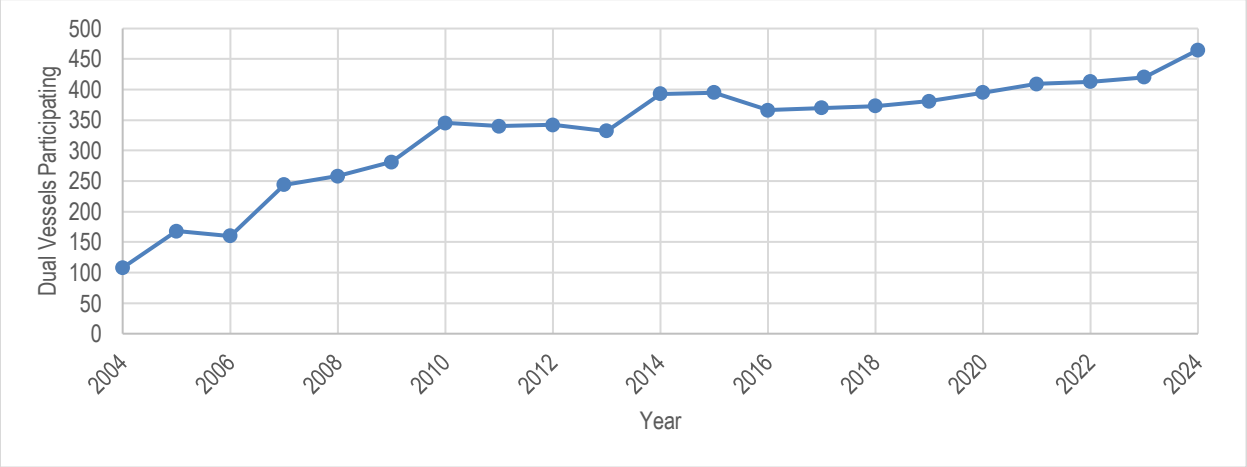


Table 1-7. Dual and Single Permit Vessel Operations, 2004-2024

Year	Dual Permit Vessels	Single Permit Vessels	Total Vessels
2004	108	1302	1372
2005	168	1299	1387
2006	160	1390	1463
2007	244	1223	1403
2008	258	1184	1396
2009	281	1136	1356
2010	345	1297	1407
2011	340	1355	1444
2012	342	1218	1433
2013	332	1347	1408
2014	393	1302	1464
2015	395	1273	1478
2016	366	1213	1372
2017	370	1278	1386
2018	373	1253	1382
2019	381	1257	1416
2020	395	1172	1350
2021	409	1161	1360
2022	413	1235	1383
2023	420	1113	1312
2024	465	978	1236

Table 1-8 displays the earnings per vessel, and the earnings per permit aboard those vessels in both single and dual permit vessel operations. As vessel my switch between dual and single permit operations within a given year, earnings are apportioned based upon if the vessel was registered as a D-Boat or not at the time a delivery was made. D-Boats on average have twice the gross earnings as single permit vessel operations, but per permit, earnings are roughly the same from one year to the next (figure 1-4).

Figure 1-4. Bristol Bay Drift Gillnet Dual Fishing Permit Vessels, 2004 – 2024

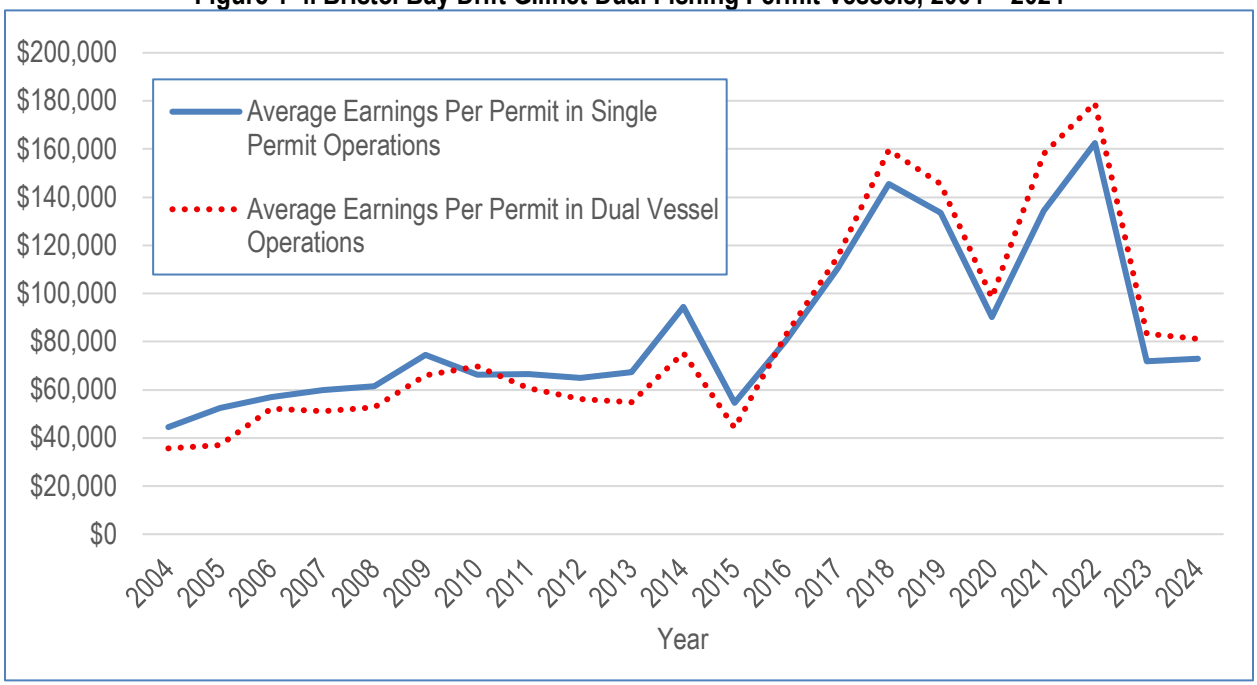


Table 1-8. Earnings by Vessel and Operation Type, 2004 – 2024

	Single Permit Vessel Operations				Dual Permit Vessel Operations			
Year	Vessels	Total Earnings	Average Vessel Earnings	Average Earnings Per Permit	Vessels	Total Earnings	Average Vessel Earnings	Average Earnings Per Permit
2004	1302	$57,917,694	$44,484	$44,484	108	$7,702,015	$71,315	$35,657
2005	1299	$68,169,689	$52,479	$52,479	168	$12,395,823	$73,785	$36,892.
2006	1390	$79,083,741	$56,895	$56,895	160	$16,722,505	$104,516	$52,258
2007	1223	$73,064,030	$59,742	$59,742	244	$24,885,191	$101,988	$50,994
2008	1184	$72,914,051	$61,583	$61,583	258	$27,162,393	$105,281	$52,640
2009	1136	$84,764,165	$74,616	$74,616	281	$37,014,146	$131,723	$65,861
2010	1297	$85,794,086	$66,148	$66,148	345	$48,044,845	$139,260	$69,630
2011	1355	$90,113,327	$66,504	$66,504	340	$41,224,918	$121,250	$60,625
2012	1218	$79,224,777	$65,045	$65,045	342	$38,421,590	$112,344	$56,172
2013	1347	$90,789,148	$67,401	$67,401	332	$36,425,811	$109,716	$54,858
2014	1302	$122,954,806	$94,435	$94,435	393	$59,162,338	$150,540	$75,270
2015	1273	$69,577,436	$54,656	$54,656	395	$34,941,146	$88,459	$44,229
2016	1213	$97,482,145	$80,365	$80,365	366	$60,548,741	$165,434	$82,717
2017	1278	$141,151,464	$110,447	$110,447	370	$85,311,357	$230,571	$115,286
2018	1253	$182,274,327	$145,470	$145,470	373	$119,125,559	$319,371	$159,686
2019	1257	$167,741,320	$133,446	$133,446	381	$110,839,521	$290,917	$145,459
2020	1172	$105,768,509	$90,246	$90,246	395	$77,528,294	$196,274	$98,137
2021	1161	$156,021,609	$134,386	$134,386	409	$129,301,871	$316,141	$158,071
2022	1235	$200,689,773	$162,502	$162,502	413	$148,004,647	$358,365	$179,182
2023	1113	$79,965,895	$71,847	$71,847	420	$70,017,494	$166,708	$83,354
2024	978	$71,242,170	$72,845	$72,845	465	$75,535,138	$162,441	$81,221

Age of S03T Permit Holders

Table 1-9. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	S03T	Combined Bristol Bay Salmon	Statewide Salmon Drift Gillnet	State-wide all Permits	Median Alaskan Age
1980	42.6	39.3	41.6	39.4	26.0
1981	42.5	39.2	41.3	39.4	26.4
1982	41.8	38.9	40.5	39.3	26.8
1983	41.5	38.9	40.4	39.4	27.1
1984	41.8	39.2	40.7	39.7	27.3
1985	42.0	39.4	40.9	40.0	27.5
1986	42.1	39.8	40.7	40.0	27.8
1987	42.3	39.7	41.1	40.3	28.2
1988	42.3	39.7	41.3	40.5	28.6
1989	42.8	40.1	41.5	40.9	29
1990	43.1	40.6	42.0	41.3	29.3
1991	43.2	41.0	42.3	41.8	29.7
1992	43.4	41.5	42.8	42.3	30.1
1993	43.4	41.9	43.1	42.8	30.5
1994	43.8	42.4	43.7	43.3	30.8
1995	44.0	43.0	43.9	43.7	31.1
1996	44.5	43.5	44.3	44.3	31.5
1997	45.2	44.1	45.0	44.9	31.8
1998	45.4	44.4	45.4	45.3	32.1
1999	46.1	45.1	45.9	45.9	32.3
2000	46.7	45.5	46.5	46.3	32.4
2001	47.3	46.1	47.1	46.8	32.7
2002	48.1	47.0	47.9	47.5	33.0
2003	48.4	47.3	48.3	48.1	33.2
2004	49.0	47.8	48.8	48.6	33.4
2005	49.0	47.7	49.0	49.0	33.6
2006	49.5	48.0	49.4	49.4	33.8
2007	49.0	47.8	49.5	49.8	33.9
2008	49.4	48.2	49.9	50.2	33.9
2009	49.8	48.6	50.2	50.6	33.9
2010	49.9	49.0	50.3	51.0	33.8
2011	50.4	49.4	50.6	51.3	33.9
2012	50.9	49.7	50.8	51.7	33.9
2013	51.0	49.5	50.8	51.8	34.0
2014	51.0	49.4	51.0	52.2	34.2
2015	51.5	49.6	51.2	52.6	34.4
2016	51.6	49.9	51.3	53.1	34.6
2017	51.1	50.0	51.6	53.6	34.8
2018	50.3	49.1	51.4	53.9	35.1
2019	49.6	48.6	51.4	54.0	35.4
2020	49.7	48.5	51.6	54.3	35.6
2021	48.6	46.9	51.3	54.6	36
2022	47.0	45.8	51.2	54.7	36.4
2023	46.2	45.4	50.8	55.0	36.5
2024	46.0	45.3	50.6	55.3	36.9

Table 1-9 shows the annual median age of five different cohorts of people: 1) Bristol Bay salmon drift gillnet (S03T) permit holders; 2) combined Bristol Bay salmon permit holders; 3) statewide salmon drift gillnet permit holders 4) all CFEC limited entry permit holders; and 5) the Alaskan population.

Note that these figures include ages of permit holders for both transferable and non-transferable permits; however, there were no non-transferable S03T permits issued. Some individuals hold permits in more than one fishery; in these cases, the age of the permit holder is counted once for each permit that they hold.

Between 1980 and 2016, the median age of S03T permit holders increased from 42.6 years to 51.6 years. Starting in 2016 median ages began to decrease; the median age of a permit holder in 2024 was 46 years. Over the same time from, the median age of all Alaskans increased from 26 years in 1980 to just under 37 years in 2024, an increase of 11 years.

The median age of all permit holders, statewide in Alaska, has increased from 39.4 years in 1980 to 55.3 years in 2024.

S03T Permit Value

Many permit transfers are non-monetary transactions (see Table 1-2). Table 1-10 considers solely arms-length market transactions where permits are sold. CFEC estimated values are expressed in both nominal and real (adjusted for inflation) terms.

Table 1-10. CFEC Estimated Value of Bristol Bay Salmon Drift Gillnet Permits

		Nominal		Real	
Year	S03T Permit Sales	Permit Value	Standard Deviation	Permit Value	Standard Deviation
1987	65	$131,300	$17,661	$358,700	$49,600
1988	44	$181,600	$41,404	$476,600	$111,700
1989	41	$255,600	$32,667	$640,000	$84,100
1990	60	$217,100	$20,966	$515,800	$51,200
1991	53	$209,200	$24,410	$477,100	$57,200
1992	59	$192,000	$27,262	$424,800	$62,000
1993	60	$198,600	$18,428	$426,500	$40,700
1994	72	$166,500	$15,097	$348,600	$32,500
1995	79	$195,300	$18,959	$397,800	$39,700
1996	62	$172,400	$10,422	$341,200	$21,200
1997	50	$153,800	$23,041	$297,300	$45,800
1998	64	$96,700	$8,633	$184,100	$16,900
1999	48	$88,500	$7,831	$164,900	$15,000
2000	49	$80,400	$12,520	$144,900	$23,200
2001	43	$34,000	$8,600	$59,700	$15,500
2002	66	$19,800	$2,762	$34,200	$4,900
2003	106	$29,600	$3,863	$49,900	$6,700
2004	75	$36,700	$3,967	$60,400	$6,700
2005	115	$51,300	$8,751	$81,600	$14,300
2006	98	$75,000	$5,685	$115,400	$9,000
2007	147	$79,400	$4,874	$118,900	$7,500
2008	87	$89,800	$5,397	$129,400	$8,000
2009	100	$78,000	$5,716	$112,800	$8,500
2010	107	$102,300	$14,694	$145,700	$21,500
2011	84	$143,600	$14,803	$198,100	$21,000
2012	75	$110,800	$11,944	$149,800	$16,600
2013	72	$100,400	$13,506	$133,800	$18,500
2014	74	$149,500	$10,831	$196,000	$14,600
2015	48	$148,200	$21,392	$194,000	$28,800
2016	56	$108,900	$12,411	$140,800	$16,500
2017	76	$133,300	$5,839	$168,800	$7,600
2018	84	$153,000	$8,105	$189,200	$10,300
2019	81	$175,000	$6,089	$212,400	$7,600
2020	55	$169,400	$15,981	$203,100	$19,700
2021	98	$188,300	$17,833	$215,700	$21,000
2022	89	$230,700	$16,324	$244,700	$17,800
2023	60	$170,200	$27,979	$173,400	$29,300
2024	83	$132,900	$5,604	$132,900	$5,700

- *Permit values represent averages of all arms-length sale transactions over the year. Beginning in 1991, additional data from recent months in the preceding year may be included until at least four observations can be averaged.*
- *Real permit values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.*

Bristol Bay Salmon Drift Gillnet Vessel Characteristics

Table 1-11 reports on various vessel characteristics of the Bristol Bay salmon drift gillnet fleet since 1978. Reported in this table are the age, length, horsepower, hold refrigeration, and hold capacity. This data is from the vessel license file which includes voluntarily supplied information on vessels. The first column of each category is the count of vessels with the characteristics described; other statistics reported include the 25th percentile, median, and 75th percentile.

Table 1-11. Bristol Bay Salmon Drift Gillnet Vessel Characteristics

	Vessel	Age				Length				Horsepower				Refrigeration			Hold Capacity			
Year	Count	Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	Count	%	Count	25%	Median	75%
1978	1,883	1,512	5	13	18	1,565	26	31	32	1,523	95	160	225	1,300	13	1.0%	578	168	200	300
1979	2,103	1,719	2	10	18	1,750	28	32	32	1,626	110	165	225	1,475	23	1.6%	699	168	228	320
1980	2,114	1,776	1	6	18	1,791	29	32	32	1,615	130	185	270	1,533	23	1.5%	802	190	250	350
1981	1,987	1,718	2	5	18	1,724	29	32	32	1,577	135	200	270	1,511	21	1.4%	758	200	250	360
1982	1,975	1,757	2	4	17	1,760	30	32	32	1,615	160	210	280	1,601	17	1.1%	795	200	270	375
1983	2,008	1,796	3	5	17	1,796	30	32	32	1,714	165	225	285	1,673	22	1.3%	869	200	280	370
1984	2,141	1,845	4	5	16	1,850	30	32	32	1,779	165	225	300	1,745	24	1.4%	938	200	300	380
1985	2,208	1,885	5	6	16	1,888	31	32	32	1,828	165	240	310	1,786	30	1.7%	997	200	300	400
1986	2,110	1,911	5	7	15	1,916	31	32	32	1,858	170	250	320	1,818	38	2.1%	1,065	200	300	400
1987	2,072	1,921	5	8	16	1,922	31	32	32	1,856	180	252	320	1,809	36	2.0%	1,060	200	300	400
1988	2,174	1,947	6	9	14	1,949	32	32	32	1,895	185	260	330	1,837	38	2.1%	1,115	210	300	400
1989	2,304	2,014	6	9	12	2,016	32	32	32	1,965	188	260	330	1,908	55	2.9%	1,153	216	310	420
1990	2,241	2,026	7	10	12	2,026	32	32	32	1,970	200	260	330	1,880	67	3.6%	1,143	220	320	410
1991	2,164	1,983	7	11	13	1,983	32	32	32	1,945	205	270	340	1,846	88	4.8%	1,133	240	320	420
1992	2,384	2,040	8	12	14	2,041	32	32	32	2,000	210	270	350	1,894	105	5.5%	1,180	229	320	420
1993	2,491	2,079	8	13	15	2,079	32	32	32	2,043	210	270	350	1,927	131	6.8%	1,193	240	325	440
1994	2,437	2,041	9	14	16	2,045	32	32	32	2,003	210	275	365	1,901	154	8.1%	1,178	240	325	430
1995	2,613	2,075	9	15	17	2,078	32	32	32	2,030	210	280	375	1,923	182	9.5%	1,183	240	325	450
1996	2,130	1,969	9	16	17	1,970	32	32	32	1,924	225	300	400	1,821	188	10.3%	1,123	250	325	432
1997	2,106	1,963	10	16	18	1,965	32	32	32	1,921	230	300	420	1,820	207	11.4%	1,097	250	325	432
1998	2,077	1,921	11	17	19	1,923	32	32	32	1,885	235	300	425	1,784	219	12.3%	1,073	240	325	432
1999	2,154	1,943	11	18	20	1,947	32	32	32	1,907	225	300	425	1,798	224	12.5%	1,068	240	325	432
2000	2,138	1,897	12	19	21	1,899	32	32	32	1,865	235	300	425	1,766	221	12.5%	1,049	240	325	432
2001	1,876	1,625	13	19	22	1,626	32	32	32	1,595	235	300	425	1,521	197	13.0%	904	240	320	431
2002	1,355	1,204	14	20	23	1,209	32	32	32	1,184	235	300	425	1,124	157	14.0%	661	245	325	450
2003	1,720	1,474	15	21	24	1,479	32	32	32	1,446	235	303	425	1,370	195	14.2%	777	240	325	450
2004	1,606	1,399	16	22	25	1,404	32	32	32	1,374	250	310	425	1,304	201	15.4%	750	240	325	450
2005	1,736	1,437	17	23	26	1,439	32	32	32	1,407	235	310	425	1,346	215	16.0%	781	240	325	440
2006	1,779	1,491	17	24	27	1,494	32	32	32	1,465	250	315	430	1,405	227	16.2%	811	240	325	450
2007	1,714	1,441	18	25	28	1,444	32	32	32	1,416	250	320	430	1,364	231	16.9%	788	243	335	455
2008	1,612	1,417	19	26	29	1,420	32	32	32	1,395	250	320	430	1,346	244	18.1%	779	240	325	475
2009	1,601	1,399	20	27	30	1,400	32	32	32	1,379	250	320	430	1,330	259	19.5%	771	240	334	460
2010	1,445	1,441	21	28	31	1,442	32	32	32	1,418	250	320	430	1,377	289	21.0%	800	244	336	455

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Table 1-11. Bristol Bay Salmon Drift Gillnet Vessel Characteristics

	Vessel	Age				Length				Horsepower				Refrigeration			Hold Capacity			
Year	Count	Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	Count	%	Count	25%	Median	75%
2011	1,484	1,476	22	29	32	1,476	32	32	32	1,446	250	320	435	1,418	325	22.9%	816	240	325	450
2012	1,450	1,444	23	29	33	1,444	32	32	32	1,416	250	325	450	1,397	371	26.6%	823	240	325	475
2013	1,413	1,411	23	30	34	1,412	32	32	32	1,384	250	330	450	1,364	396	29.0%	798	245	325	450
2014	1,475	1,474	24	31	35	1,474	32	32	32	1,440	260	330	460	1,420	435	30.6%	832	240	340	480
2015	1,493	1,480	25	32	36	1,480	32	32	32	1,451	260	350	460	1,430	467	32.7%	846	250	350	480
2016	1,386	1,376	25	32	36	1,376	32	32	32	1,354	260	350	480	1,330	486	36.5%	780	250	350	500
2017	1,396	1,392	26	33	37	1,392	32	32	32	1,371	265	370	500	1,343	521	38.8%	779	250	350	500
2018	1,387	1,385	27	34	38	1,385	32	32	32	1,362	270	375	503	1,334	575	43.1%	778	250	350	500
2019	1,416	1,415	26	34	39	1,415	32	32	32	1,388	270	380	525	1,366	632	46.3%	817	250	350	500
2020	1,350	1,348	26	34	40	1,348	32	32	32	1,327	290	400	600	1,300	675	51.9%	794	256	365	512
2021	1,360	1,358	26	34	41	1,358	32	32	32	1,334	300	420	600	1,311	722	55.1%	815	256	375	550
2022	1,383	1,382	26	34	42	1,382	32	32	32	1,356	300	425	630	1,329	762	57.3%	827	280	380	546
2023	1,312	1,311	25	34	42	1,311	32	32	32	1,282	318	430	650	1,250	762	61.0%	774	290	398	576
2024	1,236	1,233	14	35	42	1,233	32	32	32	1,207	320	450	670	1,175	755	64.3%	727	300	400	585

- *Total includes every vessel used in this fishery from 1978 to 2024.*

Table 1-12 provides additional Bristol Bay salmon drift gillnet vessel characteristics. Included are statistics of engine propulsion and hull material for each year since 1978.

Table 1-12. Additional Bristol Bay Salmon Drift Gillnet Vessel Characteristics

	Vessel	Engine Power Source					Hull Material											
Year	Count	Count	Diesel		Gas		Count	Aluminum		Fiberglass		Concrete		Steel		Rubber		Wood	
1978	1,883	1,559	347	22.3%	1,212	77.7%	1,567	127	8.1%	280	17.9%	0	0.0%	10	0.6%	0	0.0%	1,150	73.4%
1979	2,103	1,729	515	29.8%	1,214	70.2%	1,742	198	11.4%	449	25.8%	0	0.0%	10	0.6%	0	0.0%	1,085	62.3%
1980	2,114	1,788	707	39.5%	1,081	60.5%	1,781	275	15.4%	647	36.3%	0	0.0%	5	0.3%	0	0.0%	854	48.0%
1981	1,987	1,728	734	42.5%	994	57.5%	1,710	272	15.9%	650	38.0%	0	0.0%	5	0.3%	0	0.0%	783	45.8%
1982	1,975	1,762	859	48.8%	903	51.2%	1,754	314	17.9%	760	43.3%	0	0.0%	4	0.2%	0	0.0%	676	38.5%
1983	2,008	1,796	921	51.3%	875	48.7%	1,794	350	19.5%	804	44.8%	0	0.0%	9	0.5%	0	0.0%	631	35.2%
1984	2,141	1,847	990	53.6%	857	46.4%	1,846	384	20.8%	859	46.5%	0	0.0%	12	0.7%	0	0.0%	591	32.0%
1985	2,208	1,886	1,053	55.8%	833	44.2%	1,885	428	22.7%	914	48.5%	0	0.0%	6	0.3%	0	0.0%	537	28.5%
1986	2,110	1,908	1,131	59.3%	777	40.7%	1,912	462	24.2%	950	49.7%	0	0.0%	7	0.4%	0	0.0%	493	25.8%
1987	2,072	1,904	1,152	60.5%	752	39.5%	1,920	485	25.3%	969	50.5%	0	0.0%	8	0.4%	0	0.0%	458	23.9%
1988	2,174	1,940	1,225	63.1%	715	36.9%	1,945	527	27.1%	988	50.8%	0	0.0%	11	0.6%	0	0.0%	419	21.5%
1989	2,304	2,005	1,308	65.2%	697	34.8%	2,012	596	29.6%	1,036	51.5%	1	0.0%	9	0.4%	0	0.0%	370	18.4%
1990	2,241	2,008	1,344	66.9%	664	33.1%	2,022	630	31.2%	1,045	51.7%	0	0.0%	10	0.5%	1	0.0%	336	16.6%
1991	2,164	1,975	1,365	69.1%	610	30.9%	1,977	656	33.2%	1,027	51.9%	1	0.1%	8	0.4%	0	0.0%	285	14.4%
1992	2,384	2,032	1,443	71.0%	589	29.0%	2,035	669	32.9%	1,080	53.1%	0	0.0%	15	0.7%	0	0.0%	271	13.3%
1993	2,491	2,069	1,505	72.7%	564	27.3%	2,071	729	35.2%	1,076	52.0%	0	0.0%	19	0.9%	0	0.0%	247	11.9%
1994	2,437	2,034	1,503	73.9%	531	26.1%	2,036	737	36.2%	1,052	51.7%	0	0.0%	17	0.8%	0	0.0%	230	11.3%
1995	2,613	2,060	1,569	76.2%	491	23.8%	2,072	776	37.5%	1,057	51.0%	1	0.0%	22	1.1%	2	0.1%	214	10.3%
1996	2,130	1,949	1,534	78.7%	415	21.3%	1,965	776	39.5%	1,010	51.4%	0	0.0%	4	0.2%	0	0.0%	175	8.9%
1997	2,106	1,945	1,546	79.5%	399	20.5%	1,958	795	40.6%	996	50.9%	1	0.1%	9	0.5%	0	0.0%	157	8.0%
1998	2,077	1,909	1,526	79.9%	383	20.1%	1,919	770	40.1%	987	51.4%	0	0.0%	7	0.4%	0	0.0%	155	8.1%
1999	2,154	1,931	1,542	79.9%	389	20.1%	1,944	796	40.9%	992	51.0%	0	0.0%	10	0.5%	1	0.1%	145	7.5%
2000	2,138	1,885	1,520	80.6%	365	19.4%	1,897	795	41.9%	974	51.3%	0	0.0%	5	0.3%	1	0.1%	122	6.4%
2001	1,876	1,614	1,302	80.7%	312	19.3%	1,621	691	42.6%	834	51.4%	0	0.0%	4	0.2%	0	0.0%	92	5.7%
2002	1,355	1,199	959	80.0%	240	20.0%	1,207	537	44.5%	604	50.0%	0	0.0%	5	0.4%	1	0.1%	60	5.0%
2003	1,720	1,467	1,174	80.0%	293	20.0%	1,477	661	44.8%	748	50.6%	0	0.0%	4	0.3%	1	0.1%	63	4.3%
2004	1,606	1,393	1,149	82.5%	244	17.5%	1,403	629	44.8%	713	50.8%	0	0.0%	5	0.4%	1	0.1%	55	3.9%
2005	1,736	1,427	1,169	81.9%	258	18.1%	1,439	658	45.7%	723	50.2%	0	0.0%	7	0.5%	1	0.1%	50	3.5%
2006	1,779	1,483	1,221	82.3%	262	17.7%	1,494	705	47.2%	739	49.5%	0	0.0%	5	0.3%	2	0.1%	43	2.9%
2007	1,714	1,434	1,204	84.0%	230	16.0%	1,443	688	47.7%	713	49.4%	0	0.0%	2	0.1%	1	0.1%	39	2.7%
2008	1,612	1,411	1,197	84.8%	214	15.2%	1,420	681	48.0%	697	49.1%	0	0.0%	4	0.3%	1	0.1%	37	2.6%
2009	1,601	1,392	1,197	86.0%	195	14.0%	1,400	677	48.4%	684	48.9%	0	0.0%	4	0.3%	0	0.0%	35	2.5%
2010	1,445	1,435	1,225	85.4%	210	14.6%	1,442	706	49.0%	700	48.5%	0	0.0%	5	0.3%	0	0.0%	31	2.1%
2011	1,484	1,469	1,268	86.3%	201	13.7%	1,476	718	48.6%	728	49.3%	0	0.0%	1	0.1%	0	0.0%	29	2.0%
2012	1,450	1,438	1,260	87.6%	178	12.4%	1,444	721	49.9%	698	48.3%	0	0.0%	2	0.1%	0	0.0%	23	1.6%
2013	1,413	1,407	1,241	88.2%	166	11.8%	1,412	707	50.1%	680	48.2%	0	0.0%	1	0.1%	0	0.0%	24	1.7%
2014	1,475	1,468	1,296	88.3%	172	11.7%	1,474	742	50.3%	705	47.8%	0	0.0%	1	0.1%	0	0.0%	26	1.8%
2015	1,493	1,475	1,314	89.1%	161	10.9%	1,480	747	50.5%	711	48.0%	0	0.0%	1	0.1%	0	0.0%	21	1.4%
2016	1,386	1,372	1,237	90.2%	135	9.8%	1,376	715	52.0%	646	46.9%	0	0.0%	1	0.1%	0	0.0%	14	1.0%
2017	1,396	1,389	1,269	91.4%	120	8.6%	1,392	722	51.9%	659	47.3%	0	0.0%	1	0.1%	0	0.0%	10	0.7%
2018	1,387	1,381	1,270	92.0%	111	8.0%	1,384	729	52.7%	646	46.7%	0	0.0%	0	0.0%	0	0.0%	9	0.7%
2019	1,416	1,409	1,303	92.5%	106	7.5%	1,413	753	53.3%	649	45.9%	0	0.0%	2	0.1%	0	0.0%	9	0.6%
2020	1,350	1,341	1,244	92.8%	97	7.2%	1,345	747	55.5%	592	44.0%	0	0.0%	0	0.0%	0	0.0%	6	0.4%
2021	1,360	1,352	1,263	93.4%	89	6.6%	1,355	763	56.3%	586	43.2%	0	0.0%	2	0.1%	0	0.0%	4	0.3%
2022	1,383	1,374	1,287	93.7%	87	6.3%	1,379	806	58.4%	570	41.3%	0	0.0%	0	0.0%	0	0.0%	3	0.2%
2023	1,312	1,301	1,231	94.6%	70	5.4%	1,308	779	59.6%	528	40.4%	0	0.0%	0	0.0%	0	0.0%	1	0.1%
2024	1,236	1,223	1,157	94.6%	66	5.4%	1,230	755	61.4%	475	38.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

- *Total includes every vessel used in this fishery from 1978 to 2024.*

Participation and Earnings

Earnings are estimated from weighted average ex-vessel prices, and as noted earlier, largely stem from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 1-5 are for both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

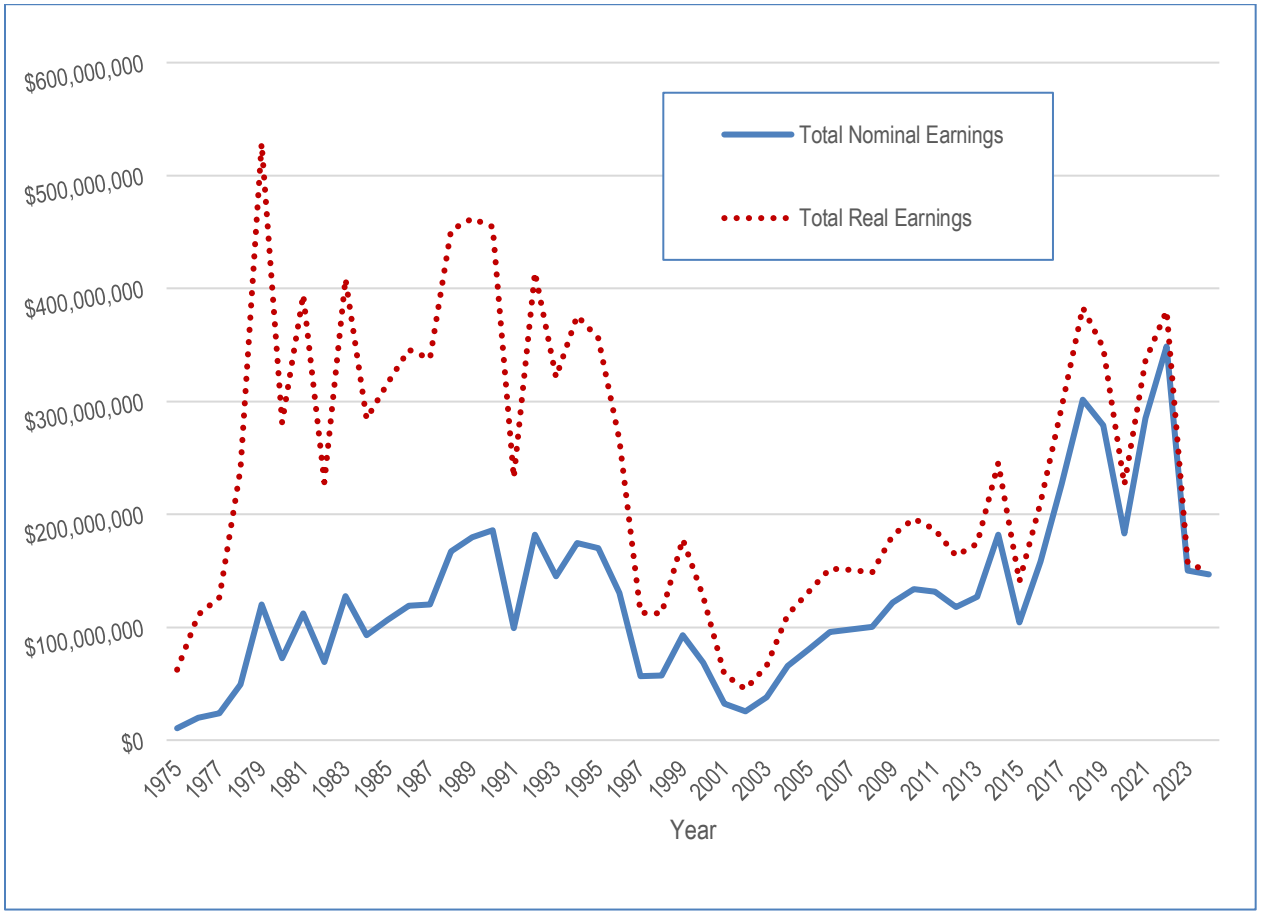
Permit counts include interim-entry permits and permanent permits. Interim-entry permits are issued to individuals during the period when their applications for permanent permits are in adjudication. The last year an interim-entry permit was held for the Bristol Bay salmon drift gillnet fishery was in 2007. Some individuals made landings on both an interim-entry permit and subsequently on their newly issued permanent permit in the same year; for these instances, only the permanent permit is counted in this report.

Table 1-13 reports the number of permits issued, permits and vessels with landings, and estimated gross earnings in the Bristol Bay salmon drift gillnet fishery from 1975 to 2024. Note that the figures by permit in this table span the entire year, regardless of who held the permit or how many times the permit was transferred.

Table 1-14 reports the number of permit holders (people) and estimated real (inflation-adjusted) gross earnings by each resident type.

Table 1-15 breaks out participation and earnings by ADF&G salmon management area with real ex-vessel values. Note that some permits are used to record landings in more than one district.

Figure 1-5. Estimated Nominal and Real Total Gross Earnings in the Bristol Bay Salmon Drift Gillnet Fishery



- *Real earnings are adjusted for inflation using the 2025 U.S. Bureau of Labor Statistics Consumer Price Index.*

Table 1-13. Estimated Total Gross Earnings (Real and Nominal) for the Bristol Bay Salmon Drift Gillnet Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2024

Year	Permits Issued	Total Nominal Earnings	Total Real Earnings	Permits with Landings	Average Real Earnings per Permit	Vessels with Landings	Average Real Earnings per Vessel
1975	1,821	$10,529,539	$62,421,211	1,249	$49,977	1,370	$45,563
1976	1,705	$19,859,648	$111,305,385	1,356	$82,084	1,427	$78,000
1977	1,724	$24,058,389	$126,643,359	1,359	$93,189	1,451	$87,280
1978	1,771	$49,183,042	$240,544,423	1,575	$152,727	1,587	$151,572
1979	1,800	$120,196,589	$528,396,224	1,714	$308,283	1,750	$301,941
1980	1,827	$72,583,988	$281,132,303	1,764	$159,372	1,848	$152,128
1981	1,827	$112,487,059	$394,717,090	1,785	$221,130	1,816	$217,355
1982	1,824	$69,074,998	$228,320,497	1,792	$127,411	1,842	$123,953
1983	1,821	$127,608,313	$408,882,555	1,797	$227,536	1,826	$223,923
1984	1,818	$92,757,369	$284,774,398	1,804	$157,857	1,863	$152,858
1985	1,834	$106,696,595	$316,408,753	1,815	$174,330	1,849	$171,124
1986	1,838	$118,928,486	$345,951,074	1,823	$189,770	1,852	$186,799
1987	1,837	$120,369,596	$338,045,972	1,824	$185,332	1,862	$181,550
1988	1,839	$167,443,171	$451,728,188	1,837	$245,905	1,869	$241,695
1989	1,867	$179,466,290	$462,035,964	1,855	$249,076	1,895	$243,818
1990	1,878	$186,085,765	$454,440,046	1,869	$243,146	1,907	$238,301
1991	1,881	$99,230,409	$232,526,616	1,873	$124,147	1,896	$122,641
1992	1,884	$182,217,012	$414,397,929	1,879	$220,542	1,915	$216,396
1993	1,886	$145,375,898	$321,077,208	1,875	$171,241	1,922	$167,054
1994	1,887	$174,569,899	$375,796,622	1,865	$201,500	1,890	$198,834
1995	1,888	$170,029,398	$356,041,560	1,882	$189,183	1,917	$185,729
1996	1,891	$130,612,195	$265,691,326	1,884	$141,025	1,921	$138,309
1997	1,899	$56,691,067	$112,690,502	1,875	$60,102	1,900	$59,311
1998	1,899	$57,202,946	$111,974,766	1,858	$60,266	1,869	$59,912
1999	1,898	$92,895,948	$177,942,188	1,847	$96,341	1,873	$95,004
2000	1,890	$68,412,338	$126,774,904	1,823	$69,542	1,841	$68,862
2001	1,877	$32,414,815	$58,421,222	1,566	$37,306	1,570	$37,211
2002	1,858	$25,432,417	$45,117,108	1,184	$38,106	1,176	$38,365
2003	1,826	$37,999,418	$65,898,590	1,424	$46,277	1,407	$46,836
2004	1,813	$65,619,709	$110,838,250	1,465	$75,658	1,372	$80,786
2005	1,816	$80,565,512	$131,652,103	1,542	$85,378	1,387	$94,919
2006	1,802	$95,806,246	$151,670,868	1,577	$96,177	1,463	$103,671
2007	1,834	$97,949,220	$150,734,055	1,633	$92,305	1,403	$107,437
2008	1,842	$100,076,444	$148,353,320	1,645	$90,184	1,396	$106,270
2009	1,838	$121,778,310	$181,096,525	1,628	$111,239	1,356	$133,552
2010	1,850	$133,838,931	$195,833,124	1,731	$113,133	1,407	$139,185
2011	1,856	$131,338,245	$186,316,435	1,758	$105,982	1,444	$129,028
2012	1,855	$117,646,367	$163,504,921	1,743	$93,807	1,433	$114,100
2013	1,852	$127,214,958	$174,259,050	1,723	$101,137	1,408	$123,764
2014	1,853	$182,117,144	$245,493,911	1,760	$139,485	1,464	$167,687
2015	1,855	$104,518,582	$140,713,366	1,757	$80,087	1,478	$95,205
2016	1,855	$158,030,886	$210,102,063	1,715	$122,508	1,372	$153,136
2017	1,854	$226,462,821	$294,786,654	1,737	$169,710	1,386	$212,689
2018	1,851	$301,399,886	$383,018,975	1,749	$218,993	1,382	$277,148
2019	1,858	$278,580,840	$347,696,747	1,776	$195,775	1,416	$245,549
2020	1,858	$183,296,803	$225,949,969	1,725	$130,985	1,350	$167,370
2021	1,856	$285,323,480	$335,996,930	1,754	$191,560	1,360	$247,057
2022	1,859	$348,694,420	$380,216,395	1,777	$213,965	1,383	$274,921
2023	1,859	$149,983,389	$157,062,605	1,720	$91,315	1,312	$119,712
2024	1,853	$146,777,308	$149,301,878	1,685	$88,606	1,236	$120,794

- *Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.*
- *Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.*

Table 1-14. Estimated Real Gross Earnings for Permit Holders in the Bristol Bay Salmon Drift Gillnet Fishery by Resident Type, 1975-2024

	Local			Nonlocal			Nonresident			Total		
		Earnings			Earnings			Earnings			Earnings	
Year	People	Total	Average	People	Total	Average	People	Total	Average	People	Total	Average
1975	465	$16,884,891	$36,312	217	$10,256,726	$47,266	570	$35,279,594	$61,894	1,252	$62,421,211	$49,857
1976	504	$41,697,668	$82,733	227	$16,807,272	$74,041	631	$52,800,445	$83,677	1,362	$111,305,385	$81,722
1977	529	$44,719,140	$84,535	229	$20,653,144	$90,188	605	$61,271,076	$101,275	1,363	$126,643,359	$92,915
1978	602	$87,815,389	$145,873	297	$39,312,808	$132,366	688	$113,416,225	$164,849	1,587	$240,544,423	$151,572
1979	634	$132,226,804	$208,560	351	$100,782,694	$287,130	746	$295,386,726	$395,961	1,731	$528,396,224	$305,255
1980	645	$78,351,965	$121,476	368	$61,571,256	$167,313	769	$141,209,081	$183,627	1,782	$281,132,303	$157,762
1981	651	$112,188,676	$172,333	388	$85,328,334	$219,918	773	$197,200,080	$255,110	1,812	$394,717,090	$217,835
1982	632	$66,319,188	$104,935	405	$60,113,866	$148,429	776	$101,887,444	$131,298	1,813	$228,320,497	$125,935
1983	628	$96,048,832	$152,944	435	$100,711,815	$231,521	755	$212,121,908	$280,956	1,818	$408,882,555	$224,908
1984	628	$72,665,229	$115,709	432	$70,990,367	$164,330	778	$141,118,802	$181,387	1,838	$284,774,398	$154,937
1985	612	$75,201,204	$122,878	442	$85,427,427	$193,275	780	$155,780,121	$199,718	1,834	$316,408,753	$172,524
1986	596	$91,731,774	$153,912	469	$91,459,518	$195,010	796	$162,759,781	$204,472	1,861	$345,951,074	$185,895
1987	606	$89,700,731	$148,021	463	$88,169,719	$190,431	794	$160,175,522	$201,732	1,863	$338,045,972	$181,452
1988	580	$119,246,815	$205,598	470	$120,324,805	$256,010	824	$212,156,568	$257,472	1,874	$451,728,188	$241,050
1989	576	$108,602,546	$188,546	460	$111,220,540	$241,784	853	$242,212,878	$283,954	1,889	$462,035,964	$244,593
1990	553	$95,885,929	$173,392	487	$108,732,116	$223,269	868	$249,822,001	$287,813	1,908	$454,440,046	$238,176
1991	538	$49,284,917	$91,608	478	$59,903,652	$125,321	884	$123,338,047	$139,523	1,900	$232,526,616	$122,382
1992	541	$79,330,533	$146,637	465	$102,352,395	$220,113	919	$232,715,002	$253,226	1,925	$414,397,929	$215,272
1993	508	$67,792,916	$133,451	466	$77,569,764	$166,459	957	$175,714,528	$183,610	1,931	$321,077,208	$166,275
1994	503	$66,733,190	$132,670	471	$90,651,486	$192,466	950	$218,411,946	$229,907	1,924	$375,796,622	$195,320
1995	469	$62,564,829	$133,400	483	$83,604,785	$173,095	976	$209,871,946	$215,033	1,928	$356,041,560	$184,669
1996	454	$49,685,294	$109,439	473	$61,331,347	$129,665	995	$154,674,685	$155,452	1,922	$265,691,326	$138,237
1997	460	$19,736,830	$42,906	465	$28,836,055	$62,013	989	$64,117,618	$64,831	1,914	$112,690,502	$58,877
1998	460	$23,629,577	$51,369	446	$25,966,827	$58,222	981	$62,378,363	$63,587	1,887	$111,974,766	$59,340
1999	455	$36,784,439	$80,845	446	$41,514,520	$93,082	975	$99,643,230	$102,198	1,876	$177,942,188	$94,852
2000	435	$26,001,461	$59,773	451	$29,115,602	$64,558	957	$71,657,841	$74,878	1,843	$126,774,904	$68,787
2001	402	$11,313,477	$28,143	377	$12,605,666	$33,437	798	$34,502,078	$43,236	1,577	$58,421,222	$37,046
2002	311	$6,222,436	$20,008	266	$10,803,117	$40,613	610	$28,091,555	$46,052	1,187	$45,117,108	$38,009
2003	365	$13,634,972	$37,356	327	$14,589,036	$44,615	740	$37,674,582	$50,912	1,432	$65,898,590	$46,019
2004	355	$18,366,966	$51,738	341	$25,705,057	$75,381	775	$66,766,227	$86,150	1,471	$110,838,250	$75,349
2005	361	$21,285,941	$58,964	372	$30,166,654	$81,093	823	$80,199,508	$97,448	1,556	$131,652,103	$84,609
2006	362	$23,713,499	$65,507	388	$37,024,128	$95,423	845	$90,933,241	$107,613	1,595	$151,670,868	$95,091
2007	342	$22,961,721	$67,140	412	$36,255,982	$88,000	897	$91,516,352	$102,025	1,651	$150,734,055	$91,299
2008	341	$20,807,125	$61,018	429	$35,802,871	$83,457	896	$91,743,325	$102,392	1,665	$148,353,320	$89,101
2009	308	$23,060,177	$74,871	386	$40,881,092	$105,910	950	$117,155,256	$123,321	1,642	$181,096,525	$110,290
2010	321	$26,024,587	$81,073	429	$46,455,827	$108,289	1007	$123,352,709	$122,495	1,757	$195,833,124	$111,459
2011	331	$23,568,507	$71,204	446	$43,678,209	$97,933	1010	$119,069,719	$117,891	1,785	$186,316,435	$104,379
2012	327	$20,295,410	$62,065	434	$37,484,337	$86,369	1004	$105,725,174	$105,304	1,764	$163,504,921	$92,690
2013	317	$21,649,238	$68,294	448	$43,290,846	$96,631	974	$109,318,966	$112,237	1,738	$174,259,050	$100,264
2014	320	$28,637,415	$89,492	467	$62,882,683	$134,652	992	$153,973,812	$155,216	1,778	$245,493,911	$138,073
2015	311	$15,498,280	$49,834	447	$35,511,660	$79,444	1018	$89,703,426	$88,117	1,775	$140,713,366	$79,275
2016	297	$23,164,385	$77,995	437	$55,084,900	$126,052	1000	$131,852,778	$131,853	1,734	$210,102,063	$121,166
2017	306	$32,560,544	$106,407	453	$79,109,239	$174,634	1003	$183,116,871	$182,569	1,762	$294,786,654	$167,302
2018	303	$44,650,907	$147,363	463	$103,881,126	$224,365	1011	$234,486,941	$231,936	1,777	$383,018,975	$215,542
2019	285	$35,779,137	$125,541	488	$95,764,234	$196,238	1022	$216,153,376	$211,500	1,795	$347,696,747	$193,703
2020	256	$20,149,392	$78,709	481	$63,558,114	$132,137	999	$142,242,462	$142,385	1,736	$225,949,969	$130,156
2021	252	$32,070,174	$127,263	497	$103,945,295	$209,145	1021	$199,981,461	$195,868	1,770	$335,996,930	$189,829
2022	250	$33,406,330	$133,625	530	$114,028,536	$215,148	1009	$232,781,529	$230,705	1,789	$380,216,395	$212,530
2023	233	$12,859,620	$55,192	515	$48,865,367	$94,884	982	$95,337,619	$97,085	1,730	$157,062,605	$90,788
2024	221	$14,496,579	$65,595	501	$48,887,794	$97,580	975	$85,917,504	$88,121	1,697	$149,301,878	$87,980

- *Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.*
- *Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year. Note that these counts are for individuals, not permits.*

Table 1-15. Gross Real Earnings for the Bristol Bay Salmon Drift Gillnet Fishery by ADF&G Salmon District, 1975 to 2024

	Togiak		Nushagak		Naknek Kvichak		Egegik		Ugashik		Other		Total	
Year	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings
1975	189	$4,577,779	495	$10,096,356	779	$35,571,942	265	$11,814,800	41	$253,238	8	$107,097	1,370	$62,421,211
1976	161	$8,923,273	519	$36,041,812	731	$43,520,895	263	$19,777,758	82	$2,887,699	10	$153,947	1,427	$111,305,385
1977	173	$13,190,804	538	$34,680,732	649	$44,810,680	367	$31,529,112	48	$2,021,189	20	$410,842	1,451	$126,643,359
1978	190	$20,145,976	740	$97,394,158	820	$97,785,788	400	$23,341,824	56	$699,160	26	$1,177,517	1,587	$240,544,423
1979	196	$15,050,737	863	$88,949,481	1,094	$350,364,977	335	$48,088,691	118	$9,718,541	821	$16,223,797	1,750	$528,396,224
1980	263	$13,304,948	1,040	$69,500,101	1,057	$149,914,489	295	$20,793,998	212	$9,685,797	328	$17,932,970	1,848	$281,132,303
1981	294	$13,035,707	936	$131,345,425	998	$162,253,758	359	$55,347,315	283	$32,173,421	17	$561,464	1,816	$394,717,090
1982	327	$14,190,114	1,097	$103,122,182	867	$63,155,092	429	$30,953,494	269	$15,908,934	23	$990,682	1,842	$228,320,497
1983	298	$10,271,024	975	$62,841,536	1,068	$226,888,888	488	$71,017,251	360	$37,585,778	17	$278,079	1,826	$408,882,555
1984	314	$10,078,777	914	$37,101,402	1,127	$148,412,474	593	$57,518,957	351	$30,480,342	44	$1,182,446	1,863	$284,774,398
1985	157	$6,265,992	616	$16,702,912	1,175	$100,770,007	946	$101,079,010	769	$90,959,607	44	$631,225	1,849	$316,408,753
1986	162	$8,928,302	830	$57,179,532	734	$52,285,380	847	$108,318,000	828	$118,798,563	38	$441,297	1,852	$345,951,074
1987	149	$9,412,597	640	$64,004,713	1,076	$100,018,968	940	$114,212,521	633	$49,035,666	49	$1,361,507	1,862	$338,045,972
1988	331	$29,211,001	536	$50,966,303	1,032	$108,333,569	1,010	$210,302,809	577	$49,842,145	64	$3,072,361	1,869	$451,728,188
1989	158	$2,869,774	446	$34,012,737	1,227	$224,395,544	998	$148,826,063	559	$50,489,553	66	$1,442,294	1,895	$462,035,964
1990	131	$3,032,557	457	$38,548,369	1,402	$236,318,485	981	$144,660,195	424	$30,618,309	64	$1,262,132	1,907	$454,440,046
1991	213	$4,574,977	463	$40,823,782	1,092	$97,389,154	672	$61,829,310	449	$27,064,661	69	$844,733	1,896	$232,526,616
1992	285	$8,326,293	527	$30,810,636	982	$123,315,634	958	$206,032,911	518	$44,824,491	103	$1,087,963	1,915	$414,397,929
1993	163	$3,619,963	535	$38,290,261	843	$66,905,603	1,207	$178,013,783	610	$33,791,366	50	$456,233	1,922	$321,077,208
1994	179	$4,529,169	530	$33,988,282	1,137	$168,905,766	1,106	$117,257,608	480	$49,725,040	77	$1,390,756	1,890	$375,796,622
1995	173	$4,138,918	522	$32,591,598	1,180	$161,407,108	943	$118,083,550	746	$39,468,056	82	$352,330	1,917	$356,041,560
1996	152	$2,967,396	633	$48,301,225	765	$71,690,856	951	$99,251,684	626	$43,218,383	33	$261,782	1,921	$265,691,326
1997	66	$740,433	622	$20,478,424	554	$4,706,753	965	$72,510,090	477	$13,855,874	42	$398,929	1,900	$112,690,502
1998	66	$1,857,356	685	$30,898,631	1,055	$28,665,058	954	$41,501,456	395	$8,688,208	62	$364,057	1,869	$111,974,766
1999	125	$2,235,805	566	$39,058,677	1,104	$67,395,541	796	$52,123,083	455	$17,102,769	22	$26,313	1,873	$177,942,188
2000	191	$4,056,470	690	$37,546,386	803	$29,302,620	827	$45,169,715	520	$10,597,891	27	$101,822	1,841	$126,774,904
2001	163	$3,181,558	802	$20,030,896	558	$20,923,868	649	$12,360,511	286	$1,922,966	4	$1,422	1,570	$58,421,222
2002	96	$934,420	488	$11,764,933	338	$4,944,330	422	$20,243,010	377	Confidential	Confidential		1,176	$45,117,108
2003	138	$2,696,157	617	$32,598,508	509	$12,305,841	559	$9,852,771	436	$8,440,932	4	$4,381	1,407	$65,898,590
2004	99	$1,681,281	433	$27,764,251	459	$18,543,702	603	$40,844,084	349	$13,760,267	887	$8,244,665	1,372	$110,838,250
2005	91	$2,136,544	652	$40,448,826	654	$34,933,973	609	$41,547,947	357	$12,540,563	12	$44,251	1,387	$131,652,103
2006	84	$2,859,616	670	$59,186,885	786	$37,491,311	528	$38,835,014	242	$13,224,252	6	$73,789	1,463	$151,670,868
2007	112	$3,840,056	645	$40,926,172	702	$44,075,358	499	$33,489,669	415	$28,402,800	.	.	1,403	$150,734,055
2008	135	$3,428,310	518	$36,010,255	770	$55,693,326	391	$39,327,102	273	$13,894,328	.	.	1,396	$148,353,320
2009	125	$3,115,400	463	$44,243,605	635	$48,752,086	537	$68,920,263	275	$16,065,171	.	.	1,356	$181,096,525
2010	94	$4,218,106	532	$54,864,234	860	$72,771,233	655	$33,560,121	346	Confidential	Confidential		1,407	$195,833,124

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Year	Togiak		Nushagak		Naknek Kvichak		Egegik		Ugashik		Other		Total	
	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings
2011	136	$5,638,073	420	$39,269,740	882	$77,692,427	689	$40,496,405	379	$23,219,790	.	.	1,444	$186,316,435
2012	118	$5,548,761	456	$17,985,250	845	$81,563,911	470	$38,183,522	329	$20,223,477	.	.	1,433	$163,504,921
2013	114	$4,869,421	385	$34,502,912	855	$53,978,590	722	$54,026,296	351	$26,881,831	.	.	1,408	$174,259,050
2014	94	$3,728,062	537	$52,145,667	976	$115,933,762	730	$61,341,069	280	Confidential		Confidential	1,464	$245,493,911
2015	80	$1,353,840	414	$19,212,821	904	$65,971,378	786	$30,479,784	275	$23,695,543	.	.	1,478	$140,713,366
2016	56	$2,560,332	476	$38,182,660	808	$79,618,125	380	$47,525,443	299	$42,215,503	.	.	1,372	$210,102,063
2017	55	$2,943,914	566	$86,775,642	689	$57,121,860	528	$97,833,535	411	$50,111,703	.	.	1,386	$294,786,654
2018	57	$5,740,062	884	$218,610,142	834	$83,321,703	433	$47,731,220	242	$27,615,848	.	.	1,382	$383,018,975
2019	81	$6,386,321	762	$122,870,806	818	$90,857,094	688	$120,116,005	313	$7,466,521	.	.	1,416	$347,696,747
2020	65	$1,838,537	613	$42,104,280	693	$84,037,085	560	$83,532,337	246	$14,437,730	.	.	1,350	$225,949,969
2021	70	$4,278,311	717	$143,351,753	789	$72,574,887	522	$69,118,963	400	$46,673,016	.	.	1,360	$335,996,930
2022	74	$3,168,276	826	$145,986,734	783	$87,058,285	477	$97,922,047	288	$46,081,053	.	.	1,383	$380,216,395
2023	51	$1,070,371	595	$43,393,499	779	$53,162,128	555	$50,199,231	280	$9,237,377	.	.	1,312	$157,062,605
2024	76	$2,340,341	588	$52,761,090	785	$47,089,539	403	$24,734,278	305	Confidential		Confidential	1,236	$149,301,878

- *Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.*
- *Some Permits are used to record landings in more than one district.*

Chapter 2 Bristol Bay Salmon Set Gillnet Fishery

S04T Permit Holdings

Limited entry permits for the Bristol Bay salmon set gillnet fishery (S04T permits) were issued starting in 1975. CFEC has issued 1,041 S04T permits. Table 2-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 63.4% (660/1,041) of the permits, Nonlocal Alaskans received 21.8% (227/1,041) of the permits, and Nonresidents received 14.8% (154/1,041). Eight hundred eighty-three of the S04T permits were issued as transferable permits, and the remaining 158 permits were issued as non-transferable permits.

Table 2-1. Initial Issuance and Year-end 2024 Totals of Bristol Bay Salmon Set Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

	Initial Issues		Transfers		Migrations		Cancellations		2024 Year End	
Residency	Count	Percentage	Count	Percent Change	Count	Percent Change	Count	Percent Change	Count	Percent Change
Local	660	63.4%	-145	-22.0%	-170	-25.8%	44	6.7%	301	31.6%
Nonlocal	227	21.8%	16	7.0%	68	30.0%	28	12.3%	283	29.7%
Nonresident	154	14.8%	129	83.8%	102	66.2%	17	11.0%	368	38.7%
Total	1041	100.0%	0	0.00%	0	0.0%	89	8.55%	952	100.0%

The number of permits held by each resident type can change for three reasons: permits can be transferred to other resident types (transfer); permit holders can move from one location to another (migration); or permits can be cancelled, such as when a permit holder does not pay the renewal fee for two consecutive years. This table indicates the extent to which these factors have contributed to net changes in permit holdings in this fishery.

Transfers of S04T Permits

Under the Limited Entry Act's terms of free transferability, permits may be sold, traded, given away, or inherited. CFEC requires the completion of a survey with each transfer.[4] The surveys provide information such as transfer acquisition methods, the relationship between individuals in the transaction, and the sale amount for instances when the permit is sold.

Table 2-2. Transfer Acquisition Methods for Bristol Bay Salmon Set Gillnet Permits, 1980-2024

	Bristol Bay Salmon Set Net		Combined Bristol Bay Salmon		Statewide Salmon Set Gillnet		All Fisheries Statewide	
Acquisition Method	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	2,067	49.8%	4,345	39.5%	7,074	51.6%	14,341	33.0%
Sale	1,820	43.9%	5,878	53.4%	5,213	38.0%	25,299	58.2%
Trade	26	0.6%	68	0.6%	97	0.7%	541	1.2%
Other	235	5.7%	718	6.5%	1,329	9.7%	3,294	7.6%
Total	4,148	100.0%	11,009	100.0%	13,713	100.0%	43,475	100.0%

Table 2-2 compares the transfer acquisition methods for the S04T permits, combined Bristol Bay salmon permit types, all statewide salmon set gillnet permits, and all limited entry permits between 1980 and 2024. About half of all S04T transfers were gifts (49.8% or 2,067), almost half were sales (43.9% or 1,820), and a

[4] CFEC implemented the transfer survey in 1980.

smaller percentage were trades (0.6% or 26) or other (5.7% or 235). The annual acquisition methods for S04T permits can be viewed in a different publication.[5]

Table 2-3. Relationships of Transferor to Transfer Recipients for Bristol Bay Salmon Set Gillnet Permits, 1980-2024

	Bristol Bay Salmon Set Net		Combined Bristol Bay Salmon		Statewide Salmon Set Gillnet		All Fisheries Statewide	
Relationship	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	983	23.7%	2,179	19.8%	2,807	20.5%	8,189	18.8%
Member of Immediate Family	1,655	39.9%	3,841	34.9%	6,566	47.9%	14,586	33.6%
Other Relative	291	7.0%	594	5.4%	948	6.9%	1,938	4.5%
Other	1,219	29.4%	4,395	39.9%	3,392	24.7%	18,762	43.2%
Total	4,148	100.0%	11,009	100.0%	13,713	100.0%	43,475	100.0%

Table 2-3 shows the relationships between the transferors and transfer recipients for S04T permits and compares S04T permit transfers with the combined Bristol Bay salmon permit types, all statewide salmon set gillnet permits, and all limited entry permits from 1980 to 2024. Transfers within the family, both between immediate family members and other relatives, total 47.9% (1,946) of all permit transfers for S04T permits compared to 40.3% (4,435) combined Bristol Bay salmon permit types, 54.8% (7,514) for all salmon set gillnet permits statewide, and 38.1% (16,524) for all limited entry permits statewide.

Emergency Transfers of S04T Permits

Commercial landings can be made with either permanently-held permits or with permits held temporarily through emergency transfers. Emergency transfers (ET) of permits are granted if illness, disability, death, required military or government service or other unavoidable hardship of a temporary, unexpected, and unforeseen nature prevents the permanent permit holder from participating in the fishery. "Hardship" does not include the results of a permit holder's own economic decisions, or the results of economic, biological or regulatory variables which are normally part of the risk of doing business as a fisherman. At the end of the year, ET permits automatically revert to the permanent permit holder.

Table 2-4 shows the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. Some individuals who made landings with ET permits also made landings with permanent permits in the same year.

[5] See *Changes in the Distribution of Alaska's Commercial Fisheries Entry Permits, 1975-2024*, CFEC Report No. 25-03N.

Table 2-4. Use of Emergency Transfer Permits in the Bristol Bay Set Gillnet Fishery, 1975-2024

Year	Individuals with Landings	ET Permit Holders with Landings	Rate ET
1975	429	10	2.3%
1976	512	25	4.9%
1977	496	9	1.8%
1978	660	22	3.3%
1979	778	37	4.8%
1980	814	40	4.9%
1981	856	38	4.4%
1982	873	44	5.0%
1983	884	38	4.3%
1984	879	38	4.3%
1985	888	54	6.1%
1986	888	61	6.9%
1987	920	75	8.2%
1988	939	65	6.9%
1989	995	84	8.4%
1990	991	85	8.6%
1991	967	83	8.6%
1992	1005	102	10.1%
1993	992	102	10.3%
1994	958	129	13.5%
1995	995	121	12.2%
1996	964	118	12.2%
1997	946	119	12.6%
1998	916	112	12.2%
1999	931	89	9.6%
2000	934	110	11.8%
2001	842	105	12.5%
2002	683	78	11.4%
2003	770	81	10.5%
2004	801	91	11.4%
2005	834	98	11.8%
2006	855	117	13.7%
2007	847	97	11.5%
2008	854	83	9.7%
2009	858	104	12.1%
2010	816	100	12.3%
2011	796	82	10.3%
2012	787	87	11.1%
2013	856	87	10.2%
2014	884	74	8.4%
2015	893	70	7.8%
2016	872	95	10.9%
2017	892	107	12.0%
2018	888	91	10.2%
2019	906	115	12.7%
2020	850	108	12.7%
2021	874	102	11.7%
2022	862	90	10.4%
2023	847	85	10.0%
2024	827	77	9.3%

DNR Shore Fishery Leases in the Bristol Bay Set Gillnet Fishery

The Alaska Department of Natural Resources (DNR) administers a shore fishery lease program for the use of state owned and managed tidelands by CFEC set gillnet permit holders in Bristol Bay. A shore fishery lease grants permit holders the first right of priority to fish a tract of tidelands. Many permit holders obtain shore fishery leases, although a lease is not required in order to fish.

In Bristol Bay, the DNR shore fishery lease program allows a permit holder to maintain up to two tracts per permit.[6] While some tracts are adjacent to one another, other tracts may be miles apart. Additional information regarding DNR shore fishery leases can be found in CFEC publication 25-04N.[7]

In Table 2-5, the total number of Bristol Bay set gillnet permits, permits with landings, and permits with a DNR shore fishery lease as of December 31 is reported by district. The total permits by district include permits that either had landings documented within the fishing district or had a DNR lease. While there are no restrictions as to which district an S04T permit can be used for fishing, S04T permit holders do not typically make landings in more than one district. The counts of permits with DNR shore fishery leases are depicted by district in Figure 2-1.

[6] See 11 AAC 24.0331(b)(1)(D).

[7] See *CFEC Salmon Set Gillnet Permits and DNR Shore Fishery Leases in Prince William Sound, Cook Inlet, Kodiak, Alaska Peninsula, and Bristol Bay 1975-2024*. CFEC Report No. 25-04N.

Figure 2-1. Count of Permits with DNR Shore Fishery Leases by District in Bristol Bay, 1975-2024

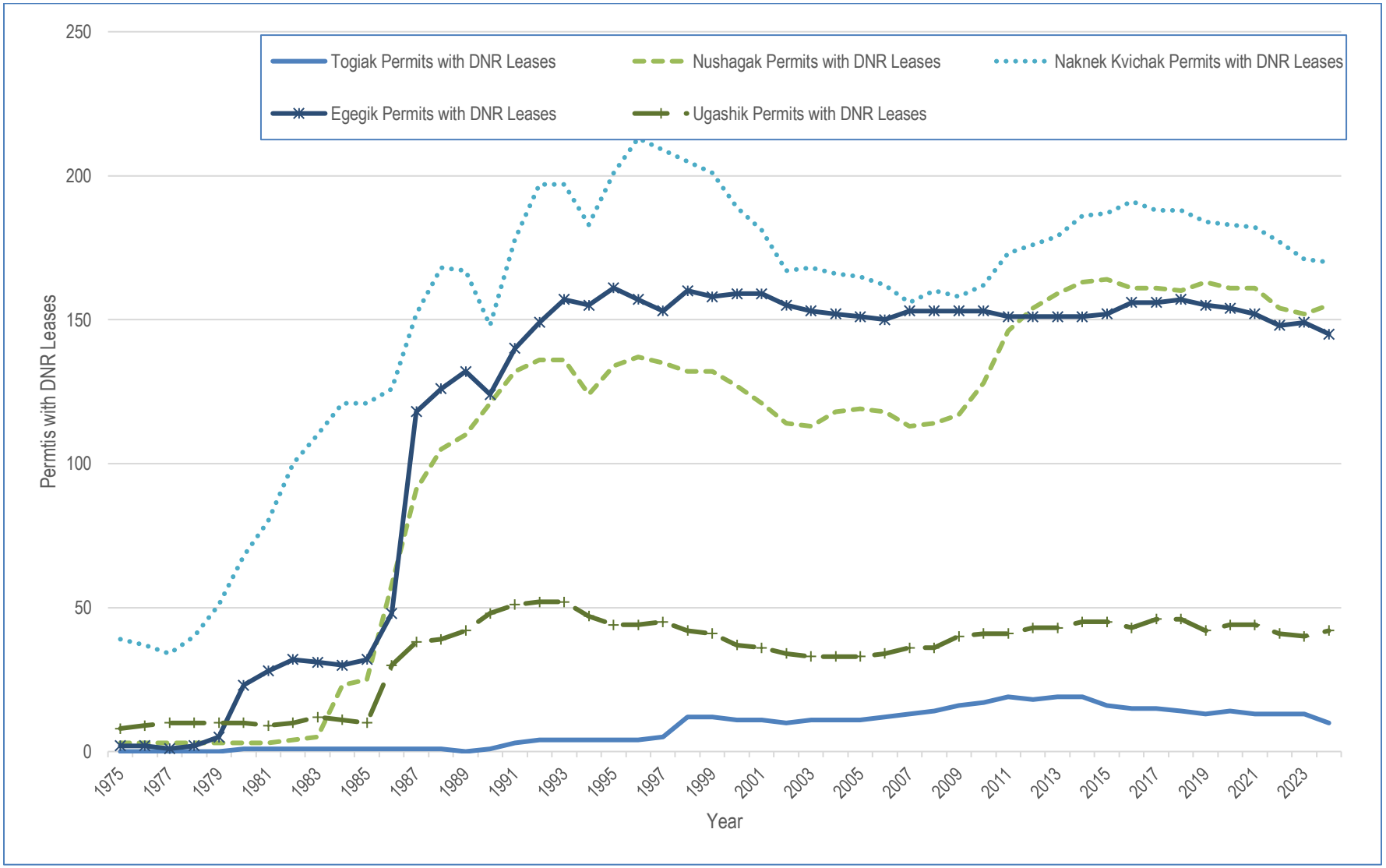


Table 2-5. Bristol Bay Set Gillnet DNR Shore Fishery Leases by District

Year	Togiak		Nushagak		Naknek Kvichak		Egegik		Ugashik	
	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings
1975	0	35	3	143	39	159	2	92	8	14
1976	0	36	3	178	37	197	2	97	9	20
1977	0	38	3	176	34	188	1	92	10	9
1978	0	51	3	229	40	273	2	131	10	6
1979	0	63	3	250	51	302	5	159	10	28
1980	1	63	3	250	68	348	23	183	10	31
1981	1	73	3	262	80	351	28	170	9	53
1982	1	72	4	263	100	349	32	173	10	57
1983	1	69	5	265	110	362	31	175	12	49
1984	1	76	23	264	121	346	30	188	11	63
1985	1	66	25	250	121	354	32	181	10	81
1986	1	103	58	282	126	302	48	190	30	82
1987	1	66	91	282	152	317	118	206	38	78
1988	1	121	105	282	168	353	126	193	39	70
1989	0	96	110	288	167	364	132	217	42	68
1990	1	76	121	342	148	439	124	215	48	64
1991	3	103	132	311	178	357	140	212	51	63
1992	4	116	136	297	197	349	149	205	52	67
1993	4	108	136	293	197	333	157	226	52	71
1994	4	115	124	295	183	322	155	224	47	68
1995	4	103	134	292	201	347	161	207	44	67
1996	4	111	137	277	213	348	157	203	44	53
1997	5	84	135	283	209	299	153	242	45	58
1998	12	82	132	276	205	298	160	209	42	52
1999	12	77	132	295	201	309	158	204	41	50
2000	11	86	127	298	189	322	159	203	37	54
2001	11	82	121	277	181	250	159	193	36	51
2002	10	59	114	215	167	230	155	147	34	35
2003	11	76	113	222	168	244	153	181	33	52
2004	11	72	118	231	166	277	152	178	33	44
2005	11	71	119	236	165	288	151	184	33	57
2006	12	76	118	231	162	303	150	185	34	56
2007	13	75	113	235	156	289	153	189	36	50
2008	14	73	114	252	160	283	153	189	36	53
2009	16	70	117	253	158	275	153	194	40	54
2010	17	76	128	273	162	280	153	189	41	53
2011	19	82	146	287	173	270	151	194	41	53
2012	18	86	154	279	176	270	151	200	43	57
2013	19	79	159	267	179	257	151	188	43	58
2014	19	78	163	275	186	270	151	198	45	74
2015	16	82	164	277	187	278	152	194	45	58
2016	15	78	161	280	191	264	156	189	43	52
2017	15	80	161	284	188	272	156	189	46	59
2018	14	78	160	299	188	268	157	183	46	56
2019	13	82	163	308	184	257	155	189	42	58
2020	14	76	161	287	183	247	154	181	44	52
2021	13	72	161	297	182	255	152	191	44	59
2022	13	71	154	298	177	246	148	179	41	62
2023	13	63	152	293	171	248	149	189	40	55
2024	10	57	155	288	170	250	145	179	42	48

Latent S04T Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they fish. Permits that are not used (don't record landings) each year are referred to herein as "latent" permits for that year.

Several complications make it difficult to accurately count the number of latent permits; therefore, the figures should be viewed with caution. In some cases, permits might be active in the fishery but might not be used to record landings. This can occur when permit holders fish in a group, especially among family or friends, and the group records their landings on only one, or some, of the group's permits. Although this practice is not strictly legal,[8] it is common across the state in set gillnet fisheries. The effect would be to under-count the number of permits active in the fishery, and over-estimate the latency rate.

There are many reasons why an individual might not fish in any given year. This table does not explain any of these reasons but simply estimates the rate of permit latency.

Table 2-6. Bristol Bay Salmon Set Gillnet Permit Latency, 1975-2024

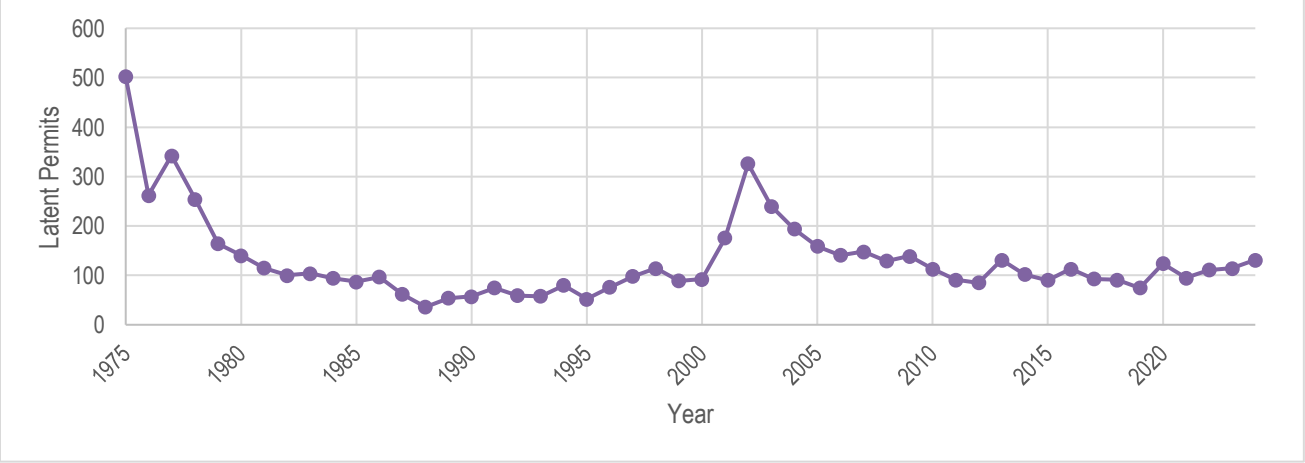
Permits			
Year	Issued	Fished	Latency Rate
1975	928	426	54.1%
1976	764	502	34.3%
1977	840	498	40.7%
1978	910	656	27.9%
1979	934	770	17.6%
1980	947	807	14.8%
1981	956	841	12.0%
1982	959	859	10.4%
1983	969	865	10.7%
1984	963	869	9.8%
1985	959	872	9.1%
1986	966	869	10.0%
1987	961	899	6.5%
1988	958	922	3.8%
1989	1025	971	5.3%
1990	1028	971	5.5%
1991	1025	950	7.3%

Permits			
Year	Issued	Fished	Latency Rate
1992	1027	968	5.7%
1993	1023	965	5.7%
1994	1019	939	7.9%
1995	1019	967	5.1%
1996	1017	941	7.5%
1997	1019	921	9.6%
1998	1015	901	11.2%
1999	1014	925	8.8%
2000	1013	921	9.1%
2001	1010	834	17.4%
2002	1006	680	32.4%
2003	1000	760	24.0%
2004	989	795	19.6%
2005	988	829	16.1%
2006	985	844	14.3%
2007	983	835	15.1%
2008	979	850	13.2%

Permits			
Year	Issued	Fished	Latency Rate
2009	982	843	14.2%
2010	982	869	11.5%
2011	981	890	9.3%
2012	979	894	8.7%
2013	978	847	13.4%
2014	977	875	10.4%
2015	975	885	9.2%
2016	971	858	11.6%
2017	972	879	9.6%
2018	970	879	9.4%
2019	965	890	7.8%
2020	964	840	12.9%
2021	964	869	9.9%
2022	961	850	11.6%
2023	957	843	11.9%
2024	952	821	13.8%

- *When an individual with an interim-entry permit is issued a permanent permit in the same year, only the permanent permit is counted.*
- *'Permits Fished' is the number of CFEC permits that were used to record commercial landings in that year.*

Figure 2-2. Bristol Bay Salmon Set Gillnet Permit Latency, 1975-2024



[8] See AS 16.05.680 (b) and AS 16.05.690 (b).

New Entrants into the Bristol Bay Salmon Set Gillnet Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S04T permit. It is important to note that initial permit holders are not considered new entrants because they needed a proven fishing history prior to 1975 in order to become an initial permit holder of a limited entry permit. Individuals who only make landings on an emergency transfer or interim-entry permit for any given year are not considered in this table.

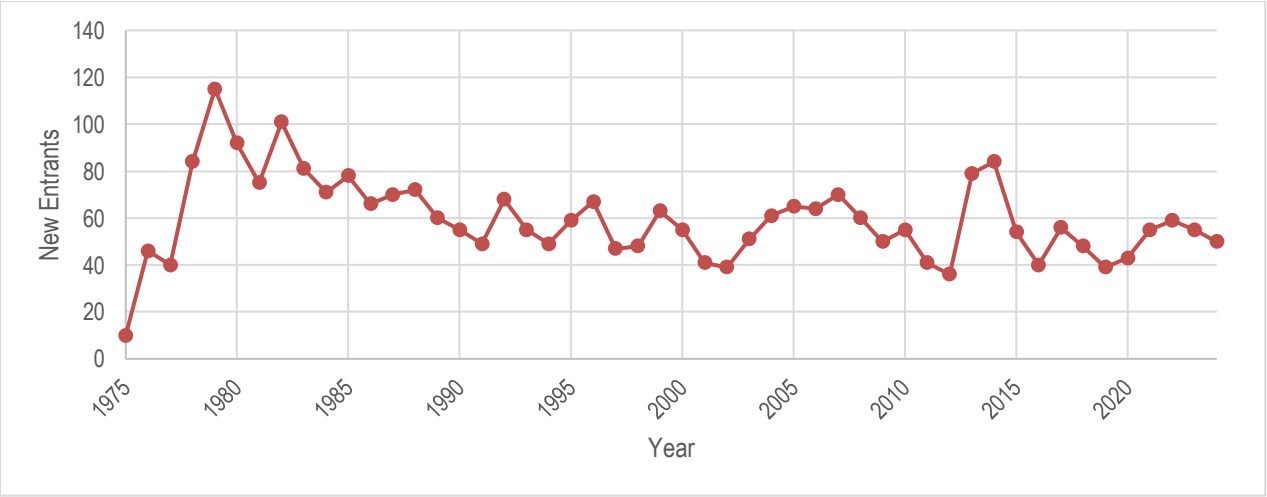
Table 2-7 and Figure 2-3 describe individuals rather than permits. An individual may hold up to two permits in this fishery but can only fish one of them. An individual may hold one S04T permit one year, and then in subsequent years hold a different S04T permit. Likewise, individuals may enter and exit the fishery multiple times over the years. Individuals are only counted once as a new entrant and only in the year in which they made their first documented landing.

Table 2-7. New Entrants into the Bristol Bay Salmon Set Gillnet Fishery, 1975-2024

Year	Individuals With Landings	New Entrants with Landings	% New Entrants
1975	429	10	2.3%
1976	512	46	9.0%
1977	496	40	8.1%
1978	660	84	12.7%
1979	778	115	14.8%
1980	814	92	11.3%
1981	856	75	8.8%
1982	873	101	11.6%
1983	884	81	9.2%
1984	879	71	8.1%
1985	888	78	8.8%
1986	888	66	7.4%
1987	920	70	7.6%
1988	939	72	7.7%
1989	995	60	6.0%
1990	991	55	5.5%
1991	967	49	5.1%
1992	1005	68	6.8%
1993	992	55	5.5%
1994	958	49	5.1%
1995	995	59	5.9%
1996	964	67	7.0%
1997	946	47	5.0%
1998	916	48	5.2%
1999	931	63	6.8%
2000	934	55	5.9%
2001	842	41	4.9%
2002	683	39	5.7%
2003	770	51	6.6%
2004	801	61	7.6%
2005	834	65	7.8%
2006	855	64	7.5%
2007	847	70	8.3%
2008	854	60	7.0%
2009	858	50	5.8%
2010	816	55	6.7%
2011	796	41	5.2%
2012	787	36	4.6%
2013	856	79	9.2%
2014	884	84	9.5%
2015	893	54	6.0%
2016	872	40	4.6%
2017	892	56	6.3%
2018	888	48	5.4%
2019	906	39	4.3%
2020	850	43	5.1%
2021	874	55	6.3%
2022	862	59	6.8%
2023	847	55	6.5%
2024	827	50	6.0%

- *This table excludes individuals with interim-entry and emergency transfer permits.*

Figure 2-3. New Entrants into the Bristol Bay Salmon Set Gillnet Fishery, 1975-2024



Age of S04T Permit Holders

Table 2-8. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	S04T	Combined Bristol Bay Salmon	Statewide Salmon Set Gillnet	Statewide All Permits	Median AK Age
1980	30.9	39.3	35.8	39.4	26
1981	31.3	39.2	36.0	39.4	26.4
1982	32.2	38.9	36.0	39.3	26.8
1983	32.8	38.9	35.7	39.4	27.1
1984	33.8	39.2	35.8	39.7	27.3
1985	34.6	39.4	36.3	40.0	27.5
1986	35.2	39.8	36.7	40.0	27.8
1987	35.8	39.7	37.0	40.3	28.2
1988	35.9	39.7	37.3	40.5	28.6
1989	37.2	40.1	38.0	40.9	29
1990	37.8	40.6	38.3	41.3	29.3
1991	38.4	41.0	38.9	41.8	29.7
1992	38.7	41.5	39.3	42.3	30.1
1993	39.5	41.9	39.9	42.8	30.5
1994	40.2	42.4	40.4	43.3	30.8
1995	40.8	43.0	41.0	43.7	31.1
1996	40.9	43.5	41.7	44.3	31.5
1997	41.3	44.1	42.0	44.9	31.8
1998	42.2	44.4	42.6	45.3	32.1
1999	42.4	45.1	43.1	45.9	32.3
2000	42.6	45.5	43.4	46.3	32.4
2001	43.3	46.1	44.1	46.8	32.7
2002	44.3	47.0	44.8	47.5	33
2003	44.4	47.3	45.5	48.1	33.2
2004	45.0	47.8	45.8	48.6	33.4
2005	44.8	47.7	46.0	49.0	33.6
2006	44.8	48.0	46.3	49.4	33.8
2007	45.2	47.8	46.8	49.8	33.9
2008	45.4	48.2	46.8	50.2	33.9
2009	45.7	48.6	47.2	50.6	33.9
2010	46.3	49.0	47.6	51.0	33.8
2011	46.4	49.4	48.1	51.3	33.9
2012	47.2	49.7	48.7	51.7	33.9
2013	46.2	49.5	48.8	51.8	34
2014	46.1	49.4	49.0	52.2	34.2
2015	46.2	49.6	49.4	52.6	34.4
2016	47.0	49.9	49.7	53.1	34.6
2017	47.0	50.0	50.0	53.6	34.8
2018	46.8	49.1	50.2	53.9	35.1
2019	46.4	48.6	50.4	54.0	35.4
2020	45.4	48.5	50.8	54.3	35.6
2021	45.0	46.9	50.9	54.6	36
2022	44.5	45.8	51.0	54.7	36.4
2023	44.6	45.4	51.5	55.0	36.5
2024	44.4	45.3	52.0	55.3	36.9

- *Age data from the CFEC permit file is as of December 31st of each year.*

Table 2-8 shows the annual median age of five different cohorts of people: 1) Bristol Bay salmon set gillnet (S04T) permit holders; 2) combined Bristol Bay salmon permit holders; 3) all salmon set gillnet permit holders statewide; 4) all CFEC limited entry permit holders; and 5) the Alaskan population.

Note that these figures include ages of permit holders for both transferable and non-transferable permits. Some individuals hold permits in more than one fishery; in these cases, the age of the permit holder is counted once for each permit that he or she holds.

The median age of the general Alaskan population has increased 10.9 years between 1980 and 2024. The change in ages over the same period for all CFEC permit holders was an increase of 15.9 years. The median age of statewide set gillnet permit holders increased by 16.2 years, while the median age for all Bristol Bay permit holders increased by 6 years.

For S04T permit holders, the median age increased by 13.5 years.

S04T Permit Stacking

From 2010 through 2012, an Alaska Board of Fisheries regulation allowed for stacked permit operations. A stacked permit operation is where an individual who holds two permits is allowed to fish two full complements of gear. CFEC completed an in-depth analysis of S04T permit stacking in 2012.[9]

Stacked permit operations are identified in this section when a permit holder makes at least one landing while holding two permits.

Tables 2-9 and 2-10 include the source and acquisition method for the second permit held by individuals at year-end. A large portion of permits was sourced from family members which is typical for set gillnet permits. The majority of permits were acquired as gifts.

Table 2-9. Transfer Acquisition Method for the Second S04T Permit

Year	Gift	Sale	Trade	Other	Unknown
2010	33	21	0	1	0
2011	57	36	0	2	0
2012	58	45	0	2	0

Table 2-10. Source of the Second S04T Permit

Year	Friend/ Partner	Immediate Family	Other Relative	Other	Unknown
2010	9	27	4	15	0
2011	16	44	5	30	0
2012	21	46	4	34	0

Table 2-11 compares the level of participation, effort, and real (2025 CPI) earnings for both single and stacked permit operations. Effort is defined as the number of complements of gear allowed; stacked permit operations were allowed to deploy two units of gear, and single permit operations can only deploy one unit of gear.

Table 2-11. Bristol Bay Salmon Set Gillnet Participation, Effort, and Real Earnings by Operation and Resident Type, 2010-2012

Year	Residency	Operation Type	Individuals with Landings	Real Gross Earnings	Average Real Gross Earnings
2010	Local	Single	285	$13,938,701.29	$48,907.72
		Stacked	20	$1,837,296.23	$91,864.81
		Combined	297	$15,775,997.52	$53,117.84
	Non Alaska Resident	Single	253	$13,591,665.85	$53,722.00
		Stacked	22	$2,671,445.04	$121,429.32
		Combined	272	$16,263,110.89	$59,790.85
	Nonlocal	Single	216	$9,821,901.03	$45,471.76
		Stacked	27	$3,530,497.06	$130,759.15
		Combined	243	$13,352,398.09	$54,948.14
	Total	Single	754	37352268.17	$49,538.82
		Stacked	69	8039238.33	$116,510.70
		Combined	816	45391506.5	$55,626.85

-continued-

[9] See *Bristol Bay Set Gillnet Permit Stacking*, CFEC Report No. 12-2N.

Year	Residency	Operation Type	Individuals with Landings	Real Gross Earnings	Average Real Gross Earnings
2011	Local	Single	289	$12,936,800.36	$44,764.02
		Stacked	16	$1,454,826.59	$90,926.66
		Combined	302	$14,391,626.95	$47,654.39
	Non Alaska Resident	Single	214	$9,361,030.41	$43,743.13
		Stacked	42	$3,645,721.96	$86,802.90
		Combined	256	$13,006,752.37	$50,807.63
	Nonlocal	Single	193	$7,538,383.03	$39,058.98
		Stacked	42	$3,890,060.32	$92,620.48
		Combined	235	$11,428,443.35	$48,631.67
	Total	Single	696	29836213.8	$42,868.12
		Stacked	100	$8,990,608.87	$89,906.09
		Combined	796	38826822.67	$48,777.42
2012	Local	Single	285	$9,909,304.87	$34,769.49
		Stacked	20	$1,457,604.48	$72,880.22
		Combined	295	$11,366,909.35	$38,531.90
	Non Alaska Resident	Single	197	$8,105,263.16	$41,143.47
		Stacked	56	$4,539,546.74	$81,063.33
		Combined	253	$12,644,809.90	$49,979.49
	Nonlocal	Single	193	$7,032,931.19	$36,440.06
		Stacked	40	$3,326,147.62	$83,153.69
		Combined	233	$10,359,078.81	$44,459.57
	Total	Single	675	25047499.22	$37,107.41
		Stacked	116	9323298.84	$80,373.27
		Combined	787	$34,370,798.06	$43,673.19

- *Real ex-vessel values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.*

S04T Permit Value

Many permit transfers are non-monetary transactions (see Table 2-2). Table 2-12 considers solely arms-length market transactions where permits are sold. CFEC estimated values are expressed in both nominal and real (adjusted for inflation) terms.

Table 2-12. CFEC Estimated Value of Bristol Bay Salmon Set Gillnet Permits

		Nominal		Real	
Year	S04T Permit Sales	Permit Value	Standard Deviation	Permit Value	Standard Deviation
1987	59	$35,200	$4,487	$96,100	$12,600
1988	41	$46,800	$9,415	$122,800	$25,400
1989	26	$60,800	$9,400	$152,300	$24,200
1990	21	$65,600	$11,261	$155,800	$27,500
1991	31	$60,600	$7,809	$138,100	$18,300
1992	45	$49,300	$5,584	$109,200	$12,700
1993	27	$48,300	$5,479	$103,800	$12,100
1994	26	$37,500	$5,156	$78,500	$11,100
1995	29	$41,900	$4,537	$85,400	$9,500
1996	45	$40,500	$3,785	$80,200	$7,700
1997	28	$37,100	$3,220	$71,800	$6,400
1998	27	$30,200	$3,627	$57,500	$7,100
1999	27	$31,100	$5,116	$57,900	$9,800
2000	30	$32,400	$3,292	$58,500	$6,100
2001	21	$26,200	$4,716	$46,000	$8,500
2002	22	$11,700	$2,424	$20,100	$4,300
2003	23	$12,100	$1,845	$20,400	$3,200
2004	25	$14,100	$2,723	$23,100	$4,600
2005	38	$15,100	$2,264	$24,000	$3,700
2006	31	$23,100	$3,664	$35,500	$5,800
2007	27	$24,000	$3,054	$35,900	$4,700
2008	25	$27,200	$2,361	$39,200	$3,500
2009	43	$28,200	$2,152	$40,800	$3,200
2010	45	$28,500	$2,529	$40,500	$3,700
2011	35	$36,500	$4,159	$50,300	$5,900
2012	28	$40,300	$2,374	$54,500	$3,300
2013	23	$39,900	$2,336	$53,200	$3,200
2014	20	$38,600	$1,855	$50,600	$2,500
2015	13	$38,500	$4,605	$50,400	$6,200
2016	16	$33,700	$3,761	$43,500	$5,000
2017	13	$38,700	$2,228	$48,900	$2,900
2018	20	$43,300	$2,282	$53,500	$2,900
2019	21	$54,600	$6,650	$66,300	$8,300
2020	13	$58,400	$5,597	$70,000	$6,900
2021	19	$61,700	$6,199	$70,700	$7,300
2022	25	$69,500	$7,337	$73,800	$8,000
2023	21	$71,400	$8,881	$72,700	$9,300
2024	19	$56,000	$5,604	$56,000	$5,700

- *Permit values represent averages of all arms-length sale transactions over the year. Additional data from recent months in the preceding year of a permit transaction may be included until at least four observations can be averaged.*
- *Real permit values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.*

Participation and Earnings

Earnings are estimated from weighted average ex-vessel prices and, as noted earlier, come primarily from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 2-4 reflect both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

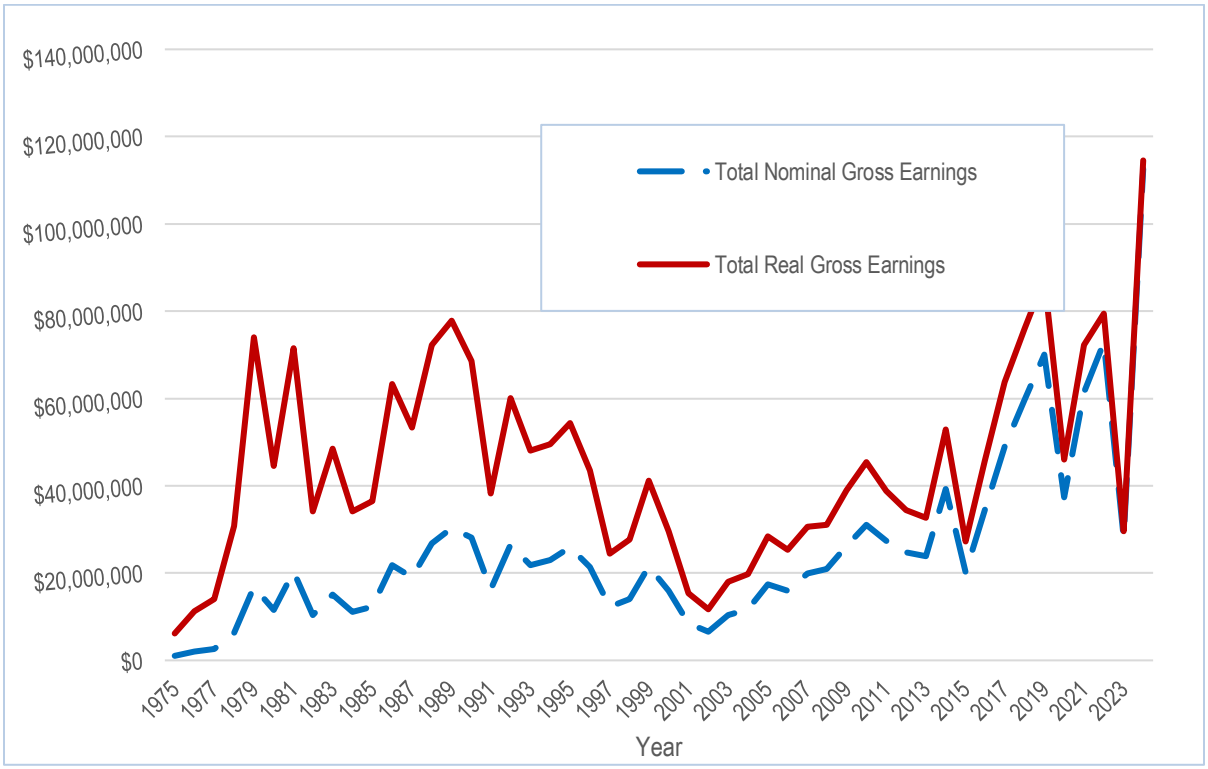
Permit counts include interim-entry permits and permanent permits. Interim-entry permits are issued to individuals during the period when their applications for permanent permits are in adjudication. The last year an interim-entry permit was held in the Bristol Bay salmon set gillnet fishery was in 2004. Some individuals made landings on both an interim-entry permit and subsequently on their newly issued permanent permit in the same year; for these instances, only the permanent permit is counted in this report.

Table 2-13 reports the number of permits issued, permits with landings, and estimated gross earnings in the Bristol Bay salmon set gillnet fishery from 1975 to 2024. Note that the figures by permit in this table span the entire year, regardless of who held the permit or how many times the permit was transferred.

Table 2-14 reports the number of permit holders (people) and estimated real (inflation adjusted) gross earnings by each resident type.

Table 2-15 breaks out participation and real earnings by ADF&G salmon management area. Note that some permits are used to record landings in more than one district.

Figure 2-4. Estimated Nominal and Real Total Gross Earnings Bristol Bay Salmon Set Gillnet Permits



- *Real earnings are adjusted for inflation using the 2025 U.S. Bureau of Labor Statistics Consumer Price Index.*

Table 2-13. Estimated Total Gross Earnings (Real and Nominal) for the Bristol Bay Salmon Set Gillnet Fishery, With Average Gross (Real) Earnings by Permit, 1975-2024

Year	Permits Issued	Total Nominal Gross Earnings	Total Real Gross Earnings	Permits with Landings	Average Real Gross Earnings per Permit
1975	786	$1,039,384	$6,161,676	426	$14,464
1976	761	$2,016,773	$11,303,204	502	$22,516
1977	835	$2,670,321	$14,056,570	498	$28,226
1978	905	$6,279,377	$30,711,179	656	$46,816
1979	934	$16,834,409	$74,005,746	770	$96,111
1980	947	$11,513,369	$44,593,582	807	$55,258
1981	955	$20,399,307	$71,581,168	841	$85,114
1982	957	$10,309,026	$34,075,453	859	$39,669
1983	961	$15,140,674	$48,513,748	865	$56,085
1984	962	$11,131,822	$34,175,808	869	$39,328
1985	959	$12,323,913	$36,546,565	872	$41,911
1986	962	$21,769,265	$63,324,616	869	$72,871
1987	960	$18,980,677	$53,305,332	899	$59,294
1988	958	$26,800,446	$72,302,244	922	$78,419
1989	1025	$30,255,514	$77,892,820	971	$80,219
1990	1027	$28,092,907	$68,605,689	971	$70,655
1991	1024	$16,309,468	$38,217,976	950	$40,229
1992	1025	$26,438,867	$60,127,271	968	$62,115
1993	1023	$21,748,260	$48,033,207	965	$49,775
1994	1019	$22,989,161	$49,488,767	939	$52,704
1995	1019	$25,943,184	$54,325,028	967	$56,179
1996	1017	$21,373,407	$43,477,784	941	$46,204
1997	1019	$12,312,359	$24,474,506	921	$26,574
1998	1015	$14,112,720	$27,625,650	901	$30,661
1999	1014	$21,521,112	$41,223,689	925	$44,566
2000	1012	$15,980,140	$29,612,798	921	$32,153
2001	1010	$8,491,102	$15,303,514	834	$18,350
2002	1002	$6,596,599	$11,702,367	680	$17,209
2003	995	$10,416,508	$18,064,309	760	$23,769
2004	985	$11,663,522	$19,700,855	795	$24,781
2005	984	$17,398,701	$28,431,217	829	$34,296
2006	983	$15,971,228	$25,284,052	844	$29,957
2007	981	$19,899,763	$30,623,746	835	$36,675
2008	976	$20,955,694	$31,064,721	850	$36,547
2009	979	$26,211,898	$38,979,714	843	$46,239
2010	927	$31,022,079	$45,391,507	861	$52,720
2011	886	$27,369,817	$38,826,823	878	$44,222
2012	874	$24,730,751	$34,370,798	883	$38,925
2013	970	$23,895,161	$32,731,591	847	$38,644
2014	973	$39,293,065	$52,967,052	875	$60,534
2015	972	$20,218,565	$27,220,254	885	$30,757
2016	965	$34,356,275	$45,676,668	858	$53,236
2017	966	$48,995,471	$63,777,405	879	$72,557
2018	967	$59,696,076	$75,861,773	879	$86,305
2019	962	$70,085,073	$87,473,180	890	$98,284
2020	964	$37,342,149	$46,031,667	840	$54,800
2021	963	$61,369,795	$72,269,070	869	$83,163
2022	961	$72,809,440	$79,391,414	850	$93,402
2023	955	$28,193,986	$29,524,742	843	$35,023
2024	949	$112,607,879	$114,544,734	821	$139,519

- *Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.*
- *Counts will differ from CFEC online Basic Information Tables where the online data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.*

Table 2-14. Estimated Real Gross Earnings for Permit Holders in the Bristol Bay Salmon Set Gillnet Fishery by Resident Type, 1975-2024

	Local			Nonlocal			Nonresident			Total		
Year	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings
1975	288	$3,903,004	$13,552	78	$1,082,691	$13,881	63	$1,175,981	$18,666	429	$6,161,676	$14,363
1976	328	$7,122,594	$21,715	87	$1,916,096	$22,024	97	$2,264,514	$23,346	512	$11,303,204	$22,077
1977	318	$8,200,202	$25,787	80	$2,440,098	$30,501	98	$3,416,269	$34,860	496	$14,056,570	$28,340
1978	408	$17,426,195	$42,711	130	$7,496,865	$57,668	122	$5,788,119	$47,444	660	$30,711,179	$46,532
1979	455	$37,091,256	$81,519	174	$20,572,046	$118,230	149	$16,342,444	$109,681	778	$74,005,746	$95,123
1980	445	$19,791,191	$44,475	194	$14,005,510	$72,193	175	$10,796,881	$61,696	814	$44,593,582	$54,783
1981	463	$33,468,673	$72,287	204	$19,673,043	$96,436	189	$18,439,452	$97,563	856	$71,581,168	$83,623
1982	443	$14,972,007	$33,797	228	$10,027,722	$43,981	202	$9,075,723	$44,929	873	$34,075,453	$39,033
1983	438	$20,000,462	$45,663	230	$14,582,340	$63,401	216	$13,930,946	$64,495	884	$48,513,748	$54,880
1984	430	$14,796,916	$34,411	236	$10,267,429	$43,506	213	$9,111,463	$42,777	879	$34,175,808	$38,880
1985	430	$15,428,319	$35,880	248	$11,138,587	$44,914	210	$9,979,659	$47,522	888	$36,546,565	$41,156
1986	427	$27,983,993	$65,536	249	$18,967,500	$76,175	212	$16,373,122	$77,232	888	$63,324,616	$71,312
1987	442	$22,452,398	$50,797	266	$17,250,703	$64,852	212	$13,602,231	$64,161	920	$53,305,332	$57,941
1988	453	$32,225,504	$71,138	263	$20,505,987	$77,970	223	$19,570,752	$87,761	939	$72,302,244	$76,999
1989	481	$30,382,944	$63,166	283	$24,485,738	$86,522	231	$23,024,139	$99,672	995	$77,892,820	$78,284
1990	454	$27,412,607	$60,380	299	$21,519,246	$71,971	238	$19,673,836	$82,663	991	$68,605,689	$69,229
1991	433	$16,948,328	$39,142	293	$11,105,645	$37,903	241	$10,164,003	$42,174	967	$38,217,976	$39,522
1992	458	$23,261,393	$50,789	303	$18,963,763	$62,587	244	$17,902,115	$73,369	1005	$60,127,271	$59,828
1993	453	$18,030,378	$39,802	295	$15,616,392	$52,937	244	$14,386,437	$58,961	992	$48,033,207	$48,421
1994	438	$19,056,791	$43,509	280	$16,450,244	$58,751	240	$13,981,733	$58,257	958	$49,488,767	$51,658
1995	450	$22,054,699	$49,010	303	$17,256,039	$56,951	242	$15,014,290	$62,043	995	$54,325,028	$54,598
1996	422	$17,760,473	$42,086	305	$14,163,995	$46,439	237	$11,553,316	$48,748	964	$43,477,784	$45,101
1997	406	$7,541,562	$18,575	295	$8,795,679	$29,816	245	$8,137,265	$33,213	946	$24,474,506	$25,872
1998	395	$10,153,053	$25,704	278	$8,901,828	$32,021	243	$8,570,769	$35,271	916	$27,625,650	$30,159
1999	386	$14,525,519	$37,631	304	$14,445,026	$47,517	241	$12,253,145	$50,843	931	$41,223,689	$44,279
2000	376	$11,417,128	$30,365	303	$9,679,774	$31,946	255	$8,515,895	$33,396	934	$29,612,798	$31,705
2001	336	$6,488,059	$19,310	265	$4,998,540	$18,862	241	$3,816,914	$15,838	842	$15,303,514	$18,175
2002	287	$3,907,438	$13,615	192	$3,773,368	$19,653	204	$4,021,560	$19,714	683	$11,702,367	$17,134
2003	301	$7,364,389	$24,466	238	$5,501,173	$23,114	231	$5,198,746	$22,505	770	$18,064,309	$23,460
2004	294	$5,391,674	$18,339	254	$6,825,662	$26,873	254	$7,483,519	$29,463	801	$19,700,855	$24,595
2005	309	$9,328,694	$30,190	267	$9,516,926	$35,644	258	$9,585,597	$37,153	834	$28,431,217	$34,090
2006	315	$8,799,372	$27,935	275	$8,339,665	$30,326	265	$8,145,015	$30,736	855	$25,284,052	$29,572
2007	309	$10,802,621	$34,960	265	$9,331,252	$35,212	273	$10,489,873	$38,424	847	$30,623,746	$36,156
2008	307	$11,149,006	$36,316	271	$9,395,012	$34,668	276	$10,520,703	$38,118	854	$31,064,721	$36,376
2009	302	$12,259,956	$40,596	278	$12,380,851	$44,535	278	$14,338,906	$51,579	858	$38,979,714	$45,431

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Bristol Bay Salmon Set Gillnet (S04T)

Year	Local			Nonlocal			Nonresident			Total		
	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings
2009	302	$12,259,956	$40,596	278	$12,380,851	$44,535	278	$14,338,906	$51,579	858	$38,979,714	$45,431
2010	297	$15,611,974	$52,566	257	$13,580,019	$52,841	272	$16,199,513	$59,557	816	$45,391,507	$55,627
2011	302	$14,333,024	$47,460	237	$11,523,317	$48,622	259	$12,970,482	$50,079	796	$38,826,823	$48,777
2012	295	$11,107,145	$37,651	235	$10,408,116	$44,290	260	$12,855,537	$49,444	787	$34,370,798	$43,673
2013	311	$11,230,934	$36,112	255	$9,792,471	$38,402	290	$11,708,186	$40,373	856	$32,731,591	$38,238
2014	316	$18,163,254	$57,479	262	$14,784,074	$56,428	306	$20,019,724	$65,424	884	$52,967,052	$59,917
2015	320	$9,357,247	$29,241	259	$7,589,014	$29,301	314	$10,273,994	$32,720	893	$27,220,254	$30,482
2016	323	$16,470,967	$50,994	245	$12,174,932	$49,694	304	$17,030,769	$56,022	872	$45,676,668	$52,381
2017	314	$19,539,578	$62,228	263	$19,145,366	$72,796	315	$25,092,461	$79,659	892	$63,777,405	$71,499
2018	327	$27,568,433	$84,307	254	$20,783,483	$81,825	307	$27,509,857	$89,609	888	$75,861,773	$85,430
2019	329	$26,532,655	$80,646	272	$26,346,065	$96,861	305	$34,594,459	$113,424	906	$87,473,180	$96,549
2020	292	$11,932,988	$40,866	260	$14,829,598	$57,037	298	$19,269,081	$64,661	850	$46,031,667	$54,155
2021	287	$20,279,938	$70,662	263	$22,907,265	$87,100	324	$29,081,867	$89,759	874	$72,269,070	$82,688
2022	288	$19,148,466	$66,488	249	$25,789,249	$103,571	325	$34,453,699	$106,011	862	$79,391,414	$92,101
2023	262	$6,770,383	$25,841	265	$9,520,582	$35,927	320	$13,233,776	$41,356	847	$29,524,742	$34,858
2024	251	$27,344,706	$108,943	253	$30,067,831	$118,845	323	$57,132,197	$176,880	827	$114,544,734	$138,506

- *Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.*
- *Counts will differ from CFEC online Basic Information Tables where the online data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.*
- *Note that these counts are for individuals, not permits.*

Table 2-15. Gross Real Earnings for the Bristol Bay Salmon Set Gillnet Fishery by ADF&G Salmon District, 1975 to 2024

	Togiak		Nushagak		Naknek-Kvichak		Egegik		Ugashik		Other		Total	
Year	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings
1975	35	$358,674	143	$1,942,461	159	$2,492,998	92	$1,328,415	14	$38,646	Confidential		444	$6,161,676
1976	36	$777,487	178	$4,167,518	197	$3,687,080	97	$2,272,072	20	$354,747	6	$44,300	534	$11,303,204
1977	38	$1,177,393	176	$2,671,080	188	$5,278,776	92	$4,572,657	9	$297,522	8	$59,142	511	$14,056,570
1978	51	$2,682,020	229	$12,742,481	273	$10,417,344	131	$4,711,197	6	$21,768	8	$136,369	698	$30,711,179
1979	63	$2,273,457	250	$13,931,376	302	$37,910,866	159	$13,837,148	28	$1,657,449	337	$4,395,451	1139	$74,005,746
1980	63	$2,362,455	250	$10,497,407	348	$20,200,385	183	$9,666,526	31	$1,455,009	44	$411,801	919	$44,593,582
1981	73	$2,982,604	262	$25,461,684	351	$21,648,515	170	$16,977,216	53	$4,333,535	21	$177,613	930	$71,581,168
1982	72	$2,124,220	263	$11,193,929	349	$9,804,032	173	$7,241,854	57	$3,166,808	18	$544,611	932	$34,075,453
1983	69	$2,007,860	265	$11,061,343	362	$20,706,552	175	$11,757,534	49	$2,928,485	7	$51,974	927	$48,513,748
1984	76	$1,947,452	264	$7,167,812	346	$15,810,511	188	$6,000,286	63	$3,018,224	16	$231,522	953	$34,175,808
1985	66	$1,362,242	250	$8,092,998	354	$14,561,699	181	$8,046,871	81	$4,211,124	18	$271,631	950	$36,546,565
1986	103	$3,255,808	282	$18,348,525	302	$23,202,962	190	$12,295,587	82	$6,172,201	7	$49,534	966	$63,324,616
1987	66	$3,668,529	282	$16,962,292	317	$17,022,562	206	$12,281,016	78	$3,178,643	9	$192,290	958	$53,305,332
1988	121	$11,512,738	282	$15,904,151	353	$17,718,372	193	$20,788,486	70	$5,912,952	14	$465,545	1033	$72,302,244
1989	96	$1,279,822	288	$23,656,131	364	$27,878,087	217	$17,575,519	68	$7,380,340	18	$122,920	1051	$77,892,820
1990	76	$1,445,788	342	$18,048,669	439	$31,941,675	215	$13,764,621	64	$3,161,039	16	$243,897	1152	$68,605,689
1991	103	$2,926,238	311	$12,924,302	357	$12,287,408	212	$6,432,453	63	$3,539,721	12	$107,853	1058	$38,217,976
1992	116	$4,946,453	297	$14,813,773	349	$15,668,827	205	$19,371,278	67	$5,042,296	18	$284,644	1052	$60,127,271
1993	108	$2,800,172	293	$13,898,965	333	$13,241,781	226	$14,173,687	71	$3,731,014	11	$187,588	1042	$48,033,207
1994	115	$3,298,557	295	$12,048,104	322	$20,226,339	224	$9,927,773	68	$3,727,623	9	$260,372	1033	$49,488,767
1995	103	$3,531,803	292	$14,284,900	347	$21,259,496	207	$13,082,294	67	$2,103,461	12	$63,073	1028	$54,325,028
1996	111	$3,229,487	277	$11,470,361	348	$15,215,356	203	$11,147,523	53	$2,364,796	6	$50,260	998	$43,477,784
1997	84	$1,160,156	283	$8,462,961	299	$1,786,472	242	$10,955,263	58	$2,038,193	9	$71,463	975	$24,474,506
1998	82	$1,896,194	276	$11,188,344	298	$5,802,073	209	$6,949,428	52	$1,751,672	7	$37,940	924	$27,625,650
1999	77	$1,908,211	295	$15,302,666	309	$12,086,745	204	$9,781,290	Confidential		Confidential		937	$41,223,689
2000	86	$2,931,753	298	$10,251,007	322	$6,510,369	203	$8,394,093	Confidential		Confidential		966	$29,612,798
2001	82	$1,547,767	277	$5,150,510	250	$5,931,646	193	$2,188,239	51	$485,316			854	$15,303,514
2002	59	$568,605	215	$3,786,469	230	$2,645,600	147	$3,672,624	35	$1,029,069		$0	686	$11,702,367
2003	76	$1,687,629	222	$6,352,496	244	$6,246,098	181	$2,609,668	52	$1,168,418		$0	775	$18,064,309
2004	72	$1,226,503	231	$5,467,567	277	$4,317,766	178	$6,741,725	44	$1,947,294		$0	802	$19,700,855
2005	71	$1,512,767	236	$6,831,411	288	$9,478,716	184	$8,498,798	Confidential		Confidential		837	$28,431,217
2006	76	$2,197,252	231	$8,034,818	303	$6,502,842	185	$6,779,695	56	$1,769,445		$0	851	$25,284,052
2007	75	$2,390,553	235	$10,229,770	289	$9,974,802	189	$5,829,893	50	$2,198,728		$0	838	$30,623,746
2008	73	$2,012,164	252	$9,270,968	283	$12,084,974	189	$6,542,485	53	$1,154,129		$0	850	$31,064,721
2009	70	$1,891,847	253	$12,454,945	275	$11,441,793	194	$10,940,121	Confidential		Confidential		848	$38,979,714
2010	76	$2,686,470	273	$16,686,483	280	$16,613,346	189	$6,159,568	53	$3,245,639		$0	871	$45,391,507
2011	82	$3,324,048	287	$11,502,226	270	$13,858,595	194	$7,125,129	53	$3,016,825		$0	886	$38,826,823
2012	86	$2,416,139	279	$9,555,645	270	$12,760,064	200	$7,252,415	57	$2,386,535		$0	892	$34,370,798
2013	79	$2,673,876	267	$9,085,009	257	$9,729,629	188	$8,628,352	Confidential		Confidential		850	$32,731,591

-continued-

Bristol Bay Salmon Set Gillnet (S04T)

	Togiak		Nushagak		Naknek-Kvichak		Egegik		Ugashik		Other		Total	
Year	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings
2014	78	$2,576,388	275	$17,358,261	270	$22,919,306	198	$7,486,393	74	$2,626,702		$0	895	$52,967,052
2015	82	$1,222,814	277	$8,226,929	278	$10,172,520	194	$5,702,709	58	$1,895,282		$0	889	$27,220,254
2016	78	$2,980,534	280	$16,708,583	264	$13,019,939	189	$9,512,091	52	$3,455,520		$0	863	$45,676,668
2017	80	$3,230,675	284	$24,597,868	272	$19,202,560	189	$12,960,786	59	$3,785,514		$0	884	$63,777,405
2018	78	$5,007,204	299	$38,842,531	268	$17,274,417	183	$10,193,470	56	$4,544,151		$0	884	$75,861,773
2019	82	$5,935,194	308	$30,577,376	257	$25,792,368	189	$21,730,362	58	$3,437,879		$0	894	$87,473,180
2020	76	$1,720,719	287	$13,895,420	247	$17,090,460	181	$10,358,685	52	$2,966,383		$0	843	$46,031,667
2021	72	$3,916,935	297	$29,395,998	255	$22,292,753	191	$11,366,225	59	$5,297,158		$0	874	$72,269,070
2022	71	$2,356,346	298	$27,664,962	246	$24,535,828	179	$20,080,667	62	$4,753,612		$0	856	$79,391,414
2023	63	$1,103,742	293	$9,950,425	248	$10,079,084	189	$7,086,348	55	$1,305,144		$0	848	$29,524,742
2024	57	$1,652,262	288	$15,021,776	250	$9,181,908	179	$5,658,534	48	$2,291,007		$0	822	$33,805,488

- *Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index. Some permits are used to record landings in more than one district.*

Chapter 3 Permit Holdings in Both Bristol Bay Salmon Fisheries.

Because of their established fishing history in multiple fisheries prior to limitation, some initial permit holders were issued permits in more than one fishery. Table 3-1 provides counts of permit holders who were issued permits in only one fishery or in both Bristol Bay salmon fisheries.

Table 3-1. Initial Issuance of Permits in the Bristol Bay Salmon Fisheries

Drift Gillnet Only	1,723
Set Gillnet Only	889
Both Fisheries	151

Table 3-2 shows the counts of individuals who either owned or fished a permit in both Bristol Bay fisheries at some point. Total participation is shown in both fisheries for perspective. The number of dual permit owners for a given year is the number of individuals who on the *last day* of the year owned both permit types.

Table 3-2. Held and Fished Salmon Permits in Bristol Bay

Year	S03T Participants	S04T Participants	Dual Participants	Dual Permit Owners
1975	1252	429	23	51
1976	1362	512	23	67
1977	1363	496	21	71
1978	1587	660	21	55
1979	1731	778	22	36
1980	1782	814	21	26
1981	1812	856	25	25
1982	1813	873	20	18
1983	1818	884	11	18
1984	1838	879	11	16
1985	1834	888	14	14
1986	1861	888	6	15
1987	1863	920	7	14
1988	1874	939	6	12
1989	1889	995	6	13
1990	1908	991	7	12
1991	1900	967	.	7
1992	1925	1005	4	8
1993	1931	992	1	8
1994	1924	958	3	7
1995	1928	995	4	7
1996	1922	964	1	8
1997	1914	946	1	9
1998	1887	916	2	11
1999	1876	931	3	10
2000	1843	934	1	10
2001	1577	842	7	13
2002	1187	683	3	16
2003	1432	770	6	16
2004	1471	801	7	16
2005	1556	834	7	23
2006	1595	855	8	23
2007	1651	847	8	22
2008	1665	854	5	23
2009	1642	858	2	23
2010	1757	816	5	21
2011	1785	796	3	14
2012	1764	787	4	16
2013	1738	856	1	14
2014	1778	884	3	15
2015	1775	893	.	14
2016	1734	872	2	14
2017	1762	892	3	16
2018	1777	888	5	21
2019	1795	906	5	19
2020	1736	850	1	15
2021	1770	874	1	17
2022	1789	862	.	17
2023	1730	847	1	17
2024	1697	827	1	16

Appendix A. Dual and Stacked Permit Regulations

Dual Permits:					
Fishery and Fishery Code	**First Season in Effect**	**Basic Regulation**	**Identification**	**Special Considerations**	**Regulations**
Kodiak Salmon Set Gillnet **S04K**	2 regulations: (a) 1985 and (b) 2008 then 2010:	(a) Two permit holders may fish in a joint venture; the operation's total allowable gear increases from 2 nets and 150 fathoms to 3 nets and to 300 fathoms (b) Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 2 nets and 150 fathoms to 4 nets and 300 fathoms. Board of Fish allowed stacked permit regulation to sunset in 2010	(a) Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits. (b) In 2008 persons who fished 2 permits were issued 2 permit cards: a standard card and a white-colored (non-functioning) card. In 2009, the non-functioning card was yellow-colored. In 2010, persons were issued 2 standard cards, and either could be used to record a landing.	(b) Permit stacking regulation sunset in 2010 and is no longer allowed	(a) 5 AAC 18.331
Bristol Bay Salmon Drift Gillnet **S03T**	2004	Two permit holders may fish from a single vessel; the vessel's total allowable gear increases from 150 to 200 fathoms	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered. Must register with F&G prior to fishing.	Dual-permit operations are not allowed in certain restricted fishing areas	5 AAC 06.333 5 AAC 06.370
Cook Inlet Salmon Drift Gillnet **S03H**	2008	Two permit holders may fish from a single vessel; the vessel's total allowable gear increases from 150 to 200 fathoms	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered.	Dual-permit operations are not allowed in certain restricted fishing areas	5 AAC 21.333

Dual Permits:					
Fishery and Fishery Code	**First Season in Effect**	**Basic Regulation**	**Identification**	**Special Considerations**	**Regulations**
Southeast Herring Gillnet **G34A**	2006	Two permit holders may fish from a single vessel; the vessel's allowable gear increases from a single 50-fathom net to a 75-fathom net.	Vessels display the letter 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered.		5 AAC 27.131(i)
Prince William Sound Salmon Seine **S01E**	2022	Two permit holders may fish from a single vessel; the vessel's allowable gear increases from 225 fathoms to 250 fathoms	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered	In times of conservation, the allowable gear may be restricted to 225 fathoms.	

Stacked Permits

2002: AS 16.43.140 (c) was amended to allow individuals to hold two salmon limited entry permits in the same fishery.
2006: AS 16.05.251 (i) gives the BOF the authority to grant fishing privileges to the second permit held by an individual.

Fishery and Fishery Code	First Season in Effect	Basic Regulation	Identification	Special Considerations	Regulations
Bristol Bay Salmon Set Gillnet **S04T**	2010	Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 2 nets and 50 fathoms to 4 nets and 100 fathoms.	Persons who fish 2 permits are issued 2 permit cards. Each are standard cards and either can be used to record a landing. Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits.	(u) "..the provisions of this subsection do not apply after December 31, 2012." (did expire in 2012)	5 AAC 06.331(u)
Cook Inlet Salmon Drift Gillnet **S03H**	2017	Permit holders may own and fish 2 permits simultaneously. Their allowable gear increases from 150 (with 1 permit) to 200 fathoms of drift gillnet gear.	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered		5 AAC 21.333(a)
Cook Inlet Salmon Set Gillnet **S04H**	2011	Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 4 nets and 105 fathoms to 210 fathoms in aggregate, with no single net longer than 35 fathoms, of which no more than 105 fathoms may be more than 29 meshes in depth in the Upper Subdistrict. (Depth modification made by Board-Generated Proposal A at the 2014 Upper Cook Inlet Finfish meeting).	Persons who fish 2 permits are issued 2 permit cards. Each are standard cards and either can be used to record a landing. Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits. The identification buoy attached to gillnet gear of no more than 29 meshes in depth must be marked with a "D 29" following the CFEC permit holder's permit number.		5 AAC 21.331

Stacked Permits

2002: AS 16.43.140 (c) was amended to allow individuals to hold two salmon limited entry permits in the same fishery.
2006: AS 16.05.251 (i) gives the BOF the authority to grant fishing privileges to the second permit held by an individual.

Fishery and Fishery Code	First Season in Effect	Basic Regulation	Identification	Special Considerations	Regulations
Yakutat Salmon Set Gillnet **S04D**	2012	Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 4 nets and 105 fathoms to 210 fathoms in aggregate, with no single net longer than 35 fathoms.	Persons who fish 2 permits are issued 2 permit cards. Each are standard cards and either can be used to record a landing. Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits. Valid only for Situk, Yakutat Bay, and Kaliakh, and only if Situk Chinook escapement exceeds 750 fish.	(e) Unless reauthorized, this regulation expires December, 2017 Update: This provision was repealed 6/17/2018 so stacking is still allowed	5 AAC 30.345

Dear Members of the Alaska Board of Fisheries,

My name is Dustin Connor. I am a lifelong Alaskan and a commercial fisherman with 27 years of experience, including 14 seasons in Bristol Bay and 11 seasons as an owner/operator in the drift gillnet fleet. I submit this testimony as both formal written comment and an annotated response to the Bristol Bay Finfish Proposals numbered 44 through 105.

My comments are based on direct on-the-water experience and on the Department's own published science, management plans, and regulatory findings, including Alaska Department of Fish and Game (ADF&G) Special Publications, Bristol Bay Science and Research Institute (BBSRI) performance assessments, and applicable sections of 5 AAC.

User-Group Priority Framework

All comments that follow evaluate proposals using the following priority of use, listed from highest to lowest:

1. Commercial drift gillnet fleet
2. Subsistence users
3. Commercial set gillnet fleet
4. Local resident recreational anglers
5. Non-resident sport and recreational anglers
6. Charter and self-guided charter operations

This priority reflects long-standing Alaska constitutional principles, historical access, economic reliance, enforceability, and conservation accountability.

Analytical Standard

Each proposal is evaluated using the same criteria:

• Conservation effectiveness based on best available science
• Enforceability and management clarity
• On-the-water efficiency and safety
• Equity in allocation and conservation burden
• Long-term precedent and cumulative impact

Where available, biological and management impacts are cited directly to ADF&G and BBSRI publications, including Special Publication No. 25-18 and associated performance assessments of the Nushagak District King Salmon Stock of Concern Management Plan .

General Observation

Recent ADF&G and BBSRI evaluations document that commercial fisheries, and particularly the drift fleet, have already absorbed substantial conservation measures through delayed openings, reduced fishing time, mesh restrictions, and inseason closures. Commercial Chinook salmon harvest has declined sharply relative to historical averages, while uncertainty in inseason assessment and declining stock productivity remain key drivers of current conditions.

Further regulatory changes must therefore be evaluated carefully to avoid disproportionately increasing restrictions on the most regulated and enforceable user group while providing limited or no conservation benefit.

Structure of Proposal Responses

For clarity and transparency, each proposal response below includes:

• A plain-language summary of the proposal
• Relevant regulatory and biological context
• Ranked impacts by user group
• A clear position: Support, Oppose, or Support with Conditions
• A concise, evidence-based rationale

Proposal-specific responses begin below.
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Proposal 44 – Limit King Salmon Retention and Require Reporting in Subsistence and Personal Use Fisheries

Summary
Proposal 44 would impose annual retention limits and mandatory reporting requirements on king salmon harvested in the personal use subsistence fishery.

Regulatory and Biological Context
ADF&G has designated the Nushagak River Chinook salmon stock as a Stock of Concern and has acknowledged that there is currently no established Amount Necessary for Subsistence (ANS) for king salmon. This proposal attempts to impose new subsistence restrictions without first establishing that baseline.

Drift Fleet Impact
This proposal does not improve conservation outcomes for the drift fleet. Instead, it introduces new social and allocation conflict without increasing escapement certainty or management effectiveness. The drift fleet is already subject to the most restrictive and enforceable conservation measures.

Position
Oppose

Rationale
Without an established ANS, imposing new subsistence limits and reporting requirements is premature and shifts focus away from fisheries where discretionary harvest and enforcement gaps remain. Conservation responsibility should not be expanded in a way that undermines subsistence priority or fails to benefit the drift fleet .

Proposal 45 – Extend Registration Period in the Naknek–Kvichak District

Summary
Proposal 45 would extend the registration and reregistration deadline in the Naknek–Kvichak District from July 17 to July 22.

Regulatory and Biological Context
Registration deadlines control access and participation across Bristol Bay districts. Drift fishermen depend on the ability to move between districts as runs peak and decline.

Drift Fleet Impact
Extending the registration period restricts drift fleet mobility and effectively concentrates access among fishermen already registered in the Naknek–Kvichak District. As other districts slow or close, this proposal limits drift fishermen’s ability to follow fish and maintain economic viability.

Position
Oppose

Rationale
This proposal functions as an access limitation rather than a conservation tool and favors fixed participation over fleet mobility, which is central to the drift fishery model .

Proposal 46 – Extend Allocation Plan Dates in the Naknek–Kvichak District

Summary
Proposal 46 would extend the Naknek–Kvichak District allocation plan regulatory period from July 17 to July 22.

Regulatory and Biological Context
Allocation plans should balance opportunity while preserving fleet mobility across Bristol Bay. Extending allocation periods can unintentionally consolidate access.

Drift Fleet Impact
This proposal limits late-season access for drift fishermen transitioning from other districts and advantages those already established in the Naknek–Kvichak District. It reduces drift fleet flexibility without providing clear conservation benefit.

Position
Oppose

Rationale
Extending allocation restrictions concentrates opportunity and limits drift fleet access during a critical period when other districts have slowed or closed .

Proposal 47 – Extend Emergency Order–Only Fishing Period in the Naknek–Kvichak District

Summary
Proposal 47 would extend the period during which fishing may only occur by emergency order from July 17 to July 22.

Regulatory and Biological Context
Emergency order authority is intended to provide management flexibility, not function as a prolonged access control mechanism.

Drift Fleet Impact
Extending EO-only management disproportionately impacts drift fishermen attempting to enter the district late in the season. This concentrates opportunity among vessels already present and limits fair access across the drift fleet.

Position
Oppose

Rationale
Prolonged EO-only periods restrict drift fleet mobility and consolidate access without demonstrated conservation gains.

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Proposal 48 – Modify Kvichak River Special Harvest Area Fishing Ratios and Gear Removal Distance

Summary
Proposal 48 would modify the Kvichak River Special Harvest Area (KRSHA) to:
1) establish a seasonal ratio of three drift gillnet fishing periods to every one set gillnet fishing period; and
2) reduce the distance that unused set gillnet gear must be removed from shore from 500 feet to 30 feet.

Regulatory and Biological Context
Special Harvest Areas are intended to prevent overescapement while allowing efficient harvest of surplus sockeye salmon. In river systems, sockeye concentrate along shorelines, and large offshore anchor buffers materially reduce drift efficiency without providing additional conservation benefit.

Drift Fleet Impact
Reducing the gear-removal distance from 500 feet to 30 feet significantly improves drift safety, efficiency, and effectiveness by allowing access to fish traveling along the banks. The proposed 3:1 drift-to-set ratio reflects expected participation levels and recognizes the drift fleet's greater mobility and ability to respond to management needs.

Position
Support with Conditions

Rationale
The reduction in gear-removal distance is strongly supported and corrects a poorly suited buffer borrowed from other river systems. The fixed 3:1 ratio is acceptable in the near term but should include periodic review to avoid locking in allocation outcomes if participation patterns change. Ratios should not become precedent divorced from actual fleet participation .

Proposal 49 – Establish a Dynamic Fishing Period Ratio in the Kvichak River Special Harvest Area

Summary
Proposal 49 would replace a fixed fishing-period ratio in the KRSHA with a dynamic system that adjusts drift-to-set openings based on actual gear participation.

Regulatory and Biological Context

ADF&G management plans routinely account for participation and effort when allocating opportunity. Static ratios can misallocate fishing time when fleet composition changes during the season.

Drift Fleet Impact
This proposal directly benefits the drift fleet by ensuring fishing opportunity tracks actual participation. As drift participation increases, opportunity increases proportionally, avoiding situations where mobile drift vessels are constrained by ratios designed for different fleet sizes.

Position
Support

Rationale
Participation-based ratios are more equitable, biologically neutral, and operationally sound than fixed ratios. This approach better reflects real fishing conditions and avoids unintended consolidation of opportunity .

Proposal 50 – Incorporate Fish Quality and Product Value into Bristol Bay Salmon Management

Summary
Proposal 50 would direct ADF&G to manage the Bristol Bay commercial salmon fishery to maximize product value and minimize waste.

Regulatory and Biological Context
Statewide fisheries policy already recognizes the importance of economic sustainability (5 AAC 39.222). Fish quality directly affects ex-vessel value, market access, and long-term fleet viability.

Drift Fleet Impact
Explicitly recognizing quality objectives supports management decisions that discourage practices such as round-hauling and excessive onboard handling that degrade fish quality and depress prices for the drift fleet.

Position
Support

Rationale
Including product quality and value in management objectives strengthens the economic sustainability of the drift fleet without undermining conservation goals and aligns Bristol Bay management with existing statewide policy .

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Proposal 51 – Allow Additional Drift Gillnet Gear Onboard in the Kvichak River Special Harvest Area

Summary
Proposal 51 would allow drift vessels fishing in the Kvichak River Special Harvest Area (KRSHA) to carry additional drift gillnet gear onboard, provided the excess gear is stored in net bags or brailer bags and not actively fished.

Regulatory and Biological Context
Existing regulations limit onboard gear to 150 fathoms regardless of whether the vessel is actively fishing multiple districts or permits. This creates inefficiency when vessels must offload gear solely to comply with transport limits.

Drift Fleet Impact
Allowing additional gear onboard improves operational efficiency, safety, and flexibility for drift vessels transitioning in and out of the KRSHA. Requiring storage in net or brailer bags prevents fishing of excess gear and protects fish quality.

Position
Support

Rationale
This proposal improves drift efficiency without increasing fishing power or conservation risk and aligns with existing quality-focused management objectives .

Proposal 52 – Create the Upper Egegik River Sockeye Salmon Special Harvest Area

Summary
Proposal 52 would establish the Upper Egegik River Special Harvest Area (UESHA) to prevent overescapement while maintaining allocation goals by providing an additional inseason management tool.

Regulatory and Biological Context
ADF&G has documented historical overescapement in the Egegik system. Special Harvest Areas are an established tool to harvest surplus sockeye while preserving escapement and allocation objectives.

Drift Fleet Impact
This proposal benefits the drift fleet by providing additional opportunity to harvest surplus fish without restricting fishing in other districts. It preserves drift mobility and avoids reallocating harvest away from active fisheries.

Position
Support

Rationale
The UESHA provides managers with a flexible, conservation-neutral tool to prevent waste through overescapement while maintaining drift access and allocation balance .

Proposal 53 – Close a Portion of the Egegik District to Mitigate Illegal Fishing Activity

Summary
Proposal 53 would authorize ADF&G to close a defined portion of the Egegik District to address persistent illegal fishing activity when enforcement resources are insufficient.

Regulatory and Biological Context
ADF&G and Alaska Wildlife Troopers have documented repeated late-season illegal fishing activity in specific boundary areas, resulting in district-wide closures that penalize compliant fishermen.

Drift Fleet Impact
Targeted closures protect law-abiding drift fishermen by preventing full-district shutdowns caused by a small number of chronic violators. This improves fairness and enforcement effectiveness.

Position
Support

Rationale
Providing managers with targeted enforcement tools protects compliant drift fishermen and reduces unnecessary economic loss caused by blanket closures .

Proposal 54 – Repeal the Nushagak River Coho Salmon Management Plan

Summary
Proposal 54 would repeal the Nushagak River Coho Salmon Management Plan due to the lack of current escapement enumeration and the plan’s inability to function as written.

Regulatory and Biological Context
ADF&G has not conducted consistent coho escapement enumeration on the Nushagak River since 2018 and has recommended discontinuing the escapement goal due to insufficient data.

Drift Fleet Impact
The existing plan no longer provides meaningful guidance and creates the appearance of management structure without enforceable biological benchmarks. Repeal avoids reliance on outdated or unsupported triggers.

Position
Support

Rationale
Maintaining a management plan without data undermines credibility and does not benefit conservation or drift fleet stability .

Proposal 55 – Remove References to the Nushagak River Coho Salmon Management Plan

Summary
Proposal 55 would remove remaining regulatory references to the repealed Nushagak River Coho Salmon Management Plan.

Regulatory and Biological Context
If the plan is repealed, residual references create confusion and regulatory inconsistency.

Drift Fleet Impact
Removing obsolete references improves regulatory clarity and avoids misapplication of defunct management provisions.

Position
Support

Rationale
This proposal ensures regulatory consistency following repeal of the coho management plan and avoids ambiguity in drift fishery management .

Proposal 56 – Permanently Adopt Offshore Set Gillnet Boundary Locations in the Nushagak District

Summary
Proposal 56 would remove the sunset clause and permanently adopt fixed offshore boundary coordinates for set gillnet operations on Ekuk Beach.

Regulatory and Biological Context

The current boundary system has improved enforceability by replacing shifting tidal benchmarks with fixed coordinates.

Drift Fleet Impact
Fixed boundaries provide clarity and predictability for drift vessels operating near set gillnets, reducing conflict and enforcement disputes.

Position
Support

Rationale
Clear, enforceable boundaries benefit both drift and setnet fleets and reduce gear conflict and enforcement ambiguity .

Proposal 57 – Apply Set Gillnet Offshore Boundary Coordinates to Drift Gillnet Operations

Summary
Proposal 57 would prohibit drift gillnet vessels from operating shoreward of established set gillnet offshore boundary coordinates and prohibit contact with set gillnet gear.

Regulatory and Biological Context
Existing boundaries define set gillnet limits but do not explicitly restrict drift vessel operations relative to those same coordinates.

Drift Fleet Impact
This proposal materially restricts drift fishing area and operational flexibility while providing limited additional conservation or safety benefit. Existing laws already prohibit gear interference and unsafe operations.

Position
Oppose

Rationale
Applying fixed offshore boundaries to drift operations unnecessarily reduces available fishing water and imposes additional access restrictions on the drift fleet without demonstrated need or benefit .
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Proposal 58 – Modify the Trigger to Open the Wood River Special Harvest Area

Summary

Proposal 58 would modify the in-season trigger to open the Wood River Special Harvest Area (WRSHA) so that it aligns with the Wood River Optimal Escapement Goal (OEG) when that goal is in use during very large runs.

Regulatory and Biological Context
ADF&G adopted an OEG for the Wood River sockeye run in years when total run size is estimated to exceed five million fish. Under current regulation, the trigger to open the WRSHA does not adjust when the OEG replaces the Sustainable Escapement Goal (SEG), creating a mismatch between management intent and in-season action.

Drift Fleet Impact
When the WRSHA opening trigger does not reflect the OEG, drift fishermen are delayed from accessing surplus sockeye, increasing the risk of overescapement and foregone harvest. This reduces efficiency and places unnecessary constraints on the drift fleet during large runs.

Position
Support

Rationale
Aligning the WRSHA trigger with the applicable escapement goal improves management consistency, reduces waste from overescapement, and preserves timely drift access to surplus fish without increasing conservation risk .

Proposal 59 – Ensure Drift Gillnet Opportunity in the Wood River Special Harvest Area

Summary
Proposal 59 would require alternating access between drift and set gillnet gear in the WRSHA once it is open, regardless of allocation status, when the Nushagak District and WRSHA are open simultaneously.

Regulatory and Biological Context
Current WRSHA regulations allow the gear group behind in allocation to fish first and continue fishing as long as it remains behind. Due to relatively fixed setnet participation and highly variable drift participation, this has resulted in set gillnets receiving the majority of WRSHA openings.

Drift Fleet Impact
Under the existing structure, the drift fleet has received little to no access to the WRSHA in many seasons, despite high participation and surplus sockeye availability. This results in inequitable access and undermines the purpose of the special harvest area.

Position

Support

Rationale
Alternating access ensures that the WRSHA functions as a true surplus harvest tool for both gear groups and prevents one gear type from capturing nearly all opportunity due to participation dynamics unrelated to conservation .

Proposal 60 – Increase Set Gillnet Length in the Wood River Special Harvest Area

Summary
Proposal 60 would increase allowable set gillnet length in the WRSHA from 25 fathoms to 37.5 fathoms.

Regulatory and Biological Context
When the WRSHA was created, shorter set gillnets were justified due to concurrent fishing with drift gear. Since gear types now fish separately, the original conflict-reduction rationale no longer applies.

Drift Fleet Impact
Increasing set gillnet length expands fixed-gear fishing power in the WRSHA without providing corresponding access or efficiency improvements for the drift fleet. This risks shifting surplus harvest toward stationary gear at the expense of mobile drift operations.

Position
Oppose

Rationale
Expanding set gillnet length in the WRSHA reallocates harvest opportunity toward fixed gear without addressing drift access limitations and is inconsistent with a drift-first management approach .

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Proposal 61 – Modify Commercial Fishing Restrictions Under the Nushagak District King Salmon Stock of Concern Plan

Summary
Proposal 61 would impose additional commercial fishing restrictions in the Nushagak District when the Chinook salmon run is projected to be below the lower end of the escapement goal range.

Regulatory and Biological Context

ADF&G has designated the Nushagak River Chinook salmon stock as a Stock of Concern and implemented a multi-year management plan that already includes delayed openings, reduced fishing time, and in-season closures. Chinook salmon have a 4–7 year life cycle, and the current plan has only been in effect for three seasons.

Drift Fleet Impact
The drift fleet has already absorbed substantial conservation burden under the existing SOC plan. Further automatic restrictions reduce fishing opportunity and economic viability while providing diminishing conservation returns. Commercial harvest reductions cannot address productivity-driven declines.

Position
Oppose

Rationale
The existing SOC plan has not been in place long enough to evaluate effectiveness over a full Chinook generation. Additional restrictions on the drift fleet are premature and risk further concentrating conservation burden on the most regulated user group .

Proposal 62 – Require Additional Commercial Fishing Closures to Protect Nushagak River Chinook Salmon

Summary
Proposal 62 would require expanded time and area closures for commercial fisheries in the Nushagak District during periods of low Chinook abundance.

Regulatory and Biological Context
ADF&G has documented that in some recent years the inriver Chinook escapement goal would not have been achievable even with zero harvest by any user group. This indicates that factors outside commercial harvest are driving stock status.

Drift Fleet Impact
This proposal further restricts drift access without addressing productivity, marine survival, or freshwater habitat factors. Repeated closures disproportionately impact mobile drift fishermen while offering limited additional escapement benefit.

Position
Oppose

Rationale

Expanded commercial closures shift conservation burden onto the drift fleet without demonstrable biological benefit and ignore documented limits of harvest-based recovery under current conditions .

Proposal 63 – Extend King Salmon Protection Measures Later into the Commercial Fishing Season

Summary
Proposal 63 would extend Chinook protection measures later into the commercial fishing season regardless of in-season run indicators.

Regulatory and Biological Context
Current regulations already delay commercial openings and reduce fishing time during peak Chinook vulnerability. ADF&G and BBSRI have both documented significant uncertainty in in-season Chinook assessment methods.

Drift Fleet Impact
Automatically extending protection measures later into the season limits drift opportunity during periods when Chinook vulnerability may already be reduced and sockeye abundance is high. This increases economic harm without clear conservation gain.

Position
Oppose

Rationale
Rigid extensions of protection measures reduce management flexibility and further penalize the drift fleet based on uncertain in-season indicators rather than biological necessity .

Proposal 64 – Modify Allocation Framework During King Salmon Stock of Concern Conditions

Summary
Proposal 64 would alter allocation priorities during periods when the Nushagak River Chinook stock is designated as a Stock of Concern.

Regulatory and Biological Context
Allocation changes under SOC conditions risk becoming permanent precedent even after stock status improves. Allocation decisions should remain separate from conservation designation unless explicitly supported by biological evidence.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet during SOC years without guaranteeing restoration once stock status improves. It introduces long-term allocation risk unrelated to conservation effectiveness.

Position
Oppose

Rationale
Conservation designations should not be used as mechanisms for reallocation. Allocation changes during SOC periods create lasting impacts that outlive the conservation concern .

Proposal 65 – Require Additional Restrictions on Commercial Fisheries to Achieve Chinook Escapement Goals

Summary
Proposal 65 would mandate further commercial fishing restrictions when Chinook escapement goals are projected to be missed.

Regulatory and Biological Context
ADF&G has documented that the drift fleet has already experienced major harvest reductions and delayed openings under the existing SOC framework. Chinook escapement shortfalls have occurred even in the absence of commercial fishing.

Drift Fleet Impact
This proposal compounds economic harm to the drift fleet without addressing the underlying drivers of Chinook decline. Additional restrictions further concentrate conservation responsibility on the most regulated sector.

Position
Oppose

Rationale
Mandating further commercial restrictions ignores biological realities and places disproportionate burden on the drift fleet while offering minimal likelihood of achieving escapement goals under current productivity conditions .

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Proposal 66 – Extend Sport Fishing Restrictions for King Salmon in the Nushagak District

Summary

Proposal 66 would extend sport fishing restrictions for king salmon in the Nushagak District during periods when the stock is designated as a Stock of Concern.

Regulatory and Biological Context
ADF&G has documented that sport fishing restrictions, including bait bans and closures, are already implemented under the current SOC framework. Enforcement coverage in remote areas remains limited, and harvest and release mortality are difficult to quantify with precision.

Drift Fleet Impact
While this proposal does not directly restrict the drift fleet, it highlights the imbalance in enforcement and accountability between commercial and sport fisheries. Without corresponding improvements in enforcement, additional sport restrictions provide limited conservation benefit while continued pressure remains unmeasured.

Position
Support with Conditions

Rationale
Sport restrictions should only be extended if accompanied by measurable improvements in enforcement presence, reporting accuracy, and accountability. Conservation measures that cannot be effectively enforced do not equitably distribute conservation burden .

Proposal 67 – Modify Sport Fishing Methods for King Salmon in the Nushagak District

Summary
Proposal 67 would further restrict allowable sport fishing methods for king salmon in the Nushagak District during SOC conditions.

Regulatory and Biological Context
ADF&G recognizes that catch-and-release mortality contributes to Chinook impacts, particularly in spawning systems. However, reliable quantification of release mortality in the Nushagak District remains limited.

Drift Fleet Impact
The drift fleet has already absorbed major conservation reductions, while sport fisheries continue to operate with limited monitoring. Additional method restrictions without enhanced enforcement risk symbolic regulation rather than meaningful conservation.

Position
Support with Conditions

Rationale

Any expansion of sport method restrictions must be paired with increased enforcement and mandatory reporting to ensure conservation benefits are real and not simply assumed .

Proposal 68 – Require Additional Sport Fishing Closures During King Salmon Stock of Concern Conditions

Summary
Proposal 68 would require additional sport fishing closures in the Nushagak District when king salmon abundance is low.

Regulatory and Biological Context
Sport fishing closures are already used as a management tool under the SOC plan. ADF&G has noted uncertainty in in-season Chinook assessment and limited enforcement coverage in some areas.

Drift Fleet Impact
This proposal acknowledges that conservation responsibility must extend beyond the commercial fleet. However, without enforcement capacity, closures risk uneven compliance and continued unaccounted impacts.

Position
Support with Conditions

Rationale
Closures should be implemented only when enforcement resources are sufficient to ensure compliance and when impacts are documented, not assumed .

Proposal 69 – Modify Personal Use Salmon Fishing Regulations in the Nushagak District

Summary
Proposal 69 would modify personal use salmon fishing regulations during periods of Chinook conservation concern.

Regulatory and Biological Context
ADF&G has identified personal use fisheries as a component of overall harvest but has limited data on effort, compliance, and post-harvest use during conservation periods.

Drift Fleet Impact
Further restricting personal use fisheries does not materially benefit the drift fleet and risks increasing allocation conflict without improving escapement outcomes.

Position
Oppose

Rationale
Absent clear evidence that personal use fisheries are preventing escapement achievement, additional restrictions are unlikely to improve conservation and may undermine public support for balanced management .

Proposal 70 – Establish New Reporting Requirements for Personal Use Fisheries

Summary
Proposal 70 would require additional reporting for personal use salmon harvests.

Regulatory and Biological Context
Accurate harvest data is necessary for effective management. However, reporting requirements must be enforceable and proportional to conservation benefit.

Drift Fleet Impact
While improved data collection is generally beneficial, imposing reporting mandates without enforcement capacity risks creating uneven compliance and limited data quality, while the drift fleet remains fully accountable and monitored.

Position
Oppose

Rationale
Reporting requirements should be implemented only when enforcement and compliance mechanisms are sufficient to ensure accurate data collection across all user groups .

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Proposal 71 – Modify Nushagak District Commercial Fishing Time During King Salmon Conservation Periods

Summary
Proposal 71 would further restrict commercial fishing time in the Nushagak District during periods of Chinook salmon conservation concern.

Regulatory and Biological Context
ADF&G has already implemented delayed openings, reduced fishing time, and inseason closures under the existing King Salmon Stock of Concern Management Plan. Available data

show that Chinook escapement shortfalls have occurred even in years with minimal or no commercial harvest.

Drift Fleet Impact
This proposal directly reduces drift fishing opportunity during periods when other Bristol Bay districts have slowed or closed, further limiting the drift fleet's ability to remain economically viable while providing minimal additional conservation benefit.

Position
Oppose

Rationale
Additional reductions in commercial fishing time further concentrate conservation burden on the drift fleet without addressing productivity-driven declines or improving escapement certainty .

Proposal 72 – Modify Nushagak District Commercial Fishing Area Boundaries During King Salmon Conservation Periods

Summary
Proposal 72 would further restrict commercial fishing areas in the Nushagak District during periods of Chinook salmon conservation concern.

Regulatory and Biological Context
Area restrictions are already used as a conservation tool under existing regulations. ADF&G has documented uncertainty in inseason Chinook assessment and limited ability to precisely target restrictions without affecting sockeye harvest.

Drift Fleet Impact
Reducing available fishing area increases congestion, gear conflict, and safety risk for drift vessels while decreasing harvest efficiency. These impacts disproportionately affect the mobile drift fleet.

Position
Oppose

Rationale
Additional area restrictions reduce drift access and efficiency without demonstrable conservation benefit and increase operational risk for drift fishermen .

Proposal 73 – Establish Additional Conservation-Based Closures in the Nushagak District

Summary
Proposal 73 would mandate new conservation-based closures in the Nushagak District during periods of low Chinook abundance.

Regulatory and Biological Context
ADF&G has documented that existing closures and delayed openings have already significantly reduced commercial Chinook harvest. Further closures do not address non-harvest-related drivers of stock decline.

Drift Fleet Impact
Mandatory closures further limit drift fleet opportunity and concentrate access among vessels already positioned in unaffected areas, increasing economic inequity within the fleet.

Position
Oppose

Rationale
Conservation closures that do not measurably improve escapement outcomes shift burden to the drift fleet without addressing underlying biological constraints .

Proposal 74 – Modify Allocation During King Salmon Stock of Concern Conditions

Summary
Proposal 74 would alter allocation priorities during periods when the Nushagak River Chinook stock is designated as a Stock of Concern.

Regulatory and Biological Context
Allocation changes made during conservation designations risk becoming permanent precedent. Allocation decisions should remain distinct from conservation tools unless explicitly supported by biological necessity.

Drift Fleet Impact
This proposal risks reallocating opportunity away from the drift fleet under the guise of conservation, with no guarantee of restoration once stock status improves.

Position
Oppose

Rationale
Conservation designations should not be used to restructure allocation. Doing so creates lasting impacts unrelated to escapement outcomes .

Proposal 75 – Establish Additional Inseason Triggers for Commercial Fishing Restrictions

Summary
Proposal 75 would create new inseason triggers that automatically impose additional commercial fishing restrictions.

Regulatory and Biological Context
ADF&G has acknowledged significant uncertainty in inseason Chinook assessment and limitations in predictive accuracy.

Drift Fleet Impact
Automatic triggers reduce management flexibility and impose restrictions based on uncertain indicators, disproportionately impacting the drift fleet while providing limited conservation benefit.

Position
Oppose

Rationale
Rigid triggers tied to uncertain inseason data risk unnecessary closures and further concentrate conservation burden on the drift fleet .

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Proposal 76 – Modify District Boundary Descriptions in the Nushagak District

Summary
Proposal 76 would revise district boundary descriptions in the Nushagak District to clarify management and enforcement authority.

Regulatory and Biological Context
Boundary clarity is essential for effective enforcement and inseason management. Ambiguous boundaries increase the likelihood of unintentional violations and inconsistent enforcement.

Drift Fleet Impact
Clear and consistent boundary definitions reduce enforcement conflict, improve safety, and provide certainty for drift vessels operating near district lines.

Position
Support

Rationale
Improved boundary clarity benefits the drift fleet by reducing enforcement ambiguity and operational risk without reallocating opportunity or increasing conservation pressure .

Proposal 77 – Modify District Boundary Markers Used for Enforcement

Summary
Proposal 77 would update or relocate physical or coordinate-based boundary markers used to define district fishing areas.

Regulatory and Biological Context
ADF&G and Alaska Wildlife Troopers rely on clear, enforceable boundary markers to ensure compliance. Inconsistent or poorly marked boundaries undermine effective enforcement.

Drift Fleet Impact
Accurate and well-defined markers protect drift fishermen from inadvertent violations and uneven enforcement, particularly during high-effort periods.

Position
Support

Rationale
Clear boundary markers improve enforceability and fairness without affecting conservation outcomes or allocation .

Proposal 78 – Adjust Commercial Fishing Periods in the Nushagak District

Summary
Proposal 78 would adjust the timing or structure of commercial fishing periods in the Nushagak District.

Regulatory and Biological Context
Fishing period structure directly affects fleet efficiency, safety, and harvest effectiveness. Adjustments must be supported by biological need or clear management benefit.

Drift Fleet Impact
Changes that further compress fishing periods increase congestion, safety risk, and gear conflict for the drift fleet, particularly during late-season fisheries.

Position

Oppose

Rationale
Absent a clear conservation or management benefit, further modification of fishing periods risks unnecessary disruption to drift operations and reduced efficiency .

Proposal 79 – Expand Management Authority to Close Additional Areas Inseason

Summary
Proposal 79 would grant expanded authority to close additional commercial fishing areas inseason.

Regulatory and Biological Context
ADF&G already possesses broad emergency order authority to manage fisheries inseason. Additional authority must be justified by demonstrated management gaps.

Drift Fleet Impact
Expanded closure authority increases uncertainty and risk for drift fishermen, particularly when closures are based on uncertain inseason indicators.

Position
Oppose

Rationale
Existing emergency order authority is sufficient. Expanding closure authority without clear justification increases instability and disproportionately impacts the drift fleet .

Proposal 80 – Modify Management Authority for Inseason Fishing Adjustments

Summary
Proposal 80 would alter how inseason fishing adjustments are authorized or implemented by managers.

Regulatory and Biological Context
Adaptive management relies on flexibility, transparency, and predictable application of authority.

Drift Fleet Impact
Changes that reduce predictability or expand discretionary authority increase operational uncertainty and economic risk for the drift fleet.

Position
Oppose

Rationale
Management authority should remain clear, limited, and predictable. Expanding discretionary adjustments without defined triggers or standards undermines stability for the drift fleet .

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Proposal 81 – Modify Commercial Fishing Time Restrictions in the Egegik District

Summary
Proposal 81 would modify commercial fishing time restrictions in the Egegik District during periods of conservation concern.

Regulatory and Biological Context
ADF&G already manages Egegik fishing time through emergency orders based on escapement performance. Existing authority allows managers to reduce effort when conservation objectives are at risk.

Drift Fleet Impact
Further restricting fishing time limits the drift fleet's ability to access fish as other districts slow or close. Time compression increases congestion, safety risk, and economic pressure without demonstrated conservation gain.

Position
Oppose

Rationale
Additional time restrictions shift conservation burden onto the drift fleet without addressing biological drivers of stock performance and reduce fleet flexibility during critical late-season periods .

Proposal 82 – Modify Commercial Fishing Area Restrictions in the Egegik District

Summary
Proposal 82 would impose additional commercial fishing area restrictions in the Egegik District.

Regulatory and Biological Context
Area restrictions are already used by ADF&G when needed to meet escapement goals. Further restrictions must demonstrate clear conservation benefit to justify reduced access.

Drift Fleet Impact
Reducing available fishing area increases congestion, gear conflict, and safety risk for drift vessels while decreasing harvest efficiency.

Position
Oppose

Rationale
Additional area restrictions reduce drift access and efficiency without clear evidence of improved escapement outcomes .

Proposal 83 – Establish Additional Inseason Triggers for Commercial Restrictions in the Egegik District

Summary
Proposal 83 would establish new inseason triggers that automatically impose commercial fishing restrictions in the Egegik District.

Regulatory and Biological Context
ADF&G has acknowledged uncertainty in inseason run assessment and limited precision in predicting escapement outcomes.

Drift Fleet Impact
Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position
Oppose

Rationale
Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 84 – Modify Allocation Priorities in the Egegik District

Summary
Proposal 84 would modify allocation priorities among commercial gear groups in the Egegik District.

Regulatory and Biological Context

Allocation changes should be evaluated independently from conservation designations and supported by clear biological or management justification.

Drift Fleet Impact
This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position
Oppose

Rationale
Using allocation changes as a conservation tool creates lasting impacts that extend beyond the stated management concern and disadvantage the drift fleet .

Proposal 85 – Expand Management Authority to Restrict Commercial Fisheries in the Egegik District

Summary
Proposal 85 would expand management authority to impose additional commercial fishing restrictions in the Egegik District.

Regulatory and Biological Context
ADF&G already has broad emergency order authority to manage fisheries inseason when conservation objectives are threatened.

Drift Fleet Impact
Expanded authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position
Oppose

Rationale
Existing management authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

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Proposal 86 – Modify Commercial Fishing Time Restrictions in the Ugashik District

Summary
Proposal 86 would modify commercial fishing time restrictions in the Ugashik District during periods of conservation concern.

Regulatory and Biological Context
ADF&G currently manages Ugashik fishing time through emergency orders based on escapement performance and run strength. Existing authority allows managers to adjust fishing time as needed to meet conservation objectives.

Drift Fleet Impact
Further restricting fishing time limits drift fleet flexibility as other districts slow or close, increasing congestion and operational risk while reducing economic opportunity without clear conservation benefit.

Position
Oppose

Rationale
Additional time restrictions concentrate conservation burden on the drift fleet without addressing underlying biological drivers and reduce the fleet's ability to efficiently harvest surplus fish .

Proposal 87 – Modify Commercial Fishing Area Restrictions in the Ugashik District

Summary
Proposal 87 would impose additional commercial fishing area restrictions in the Ugashik District.

Regulatory and Biological Context
ADF&G already utilizes area restrictions when necessary to protect escapement goals. Any expansion of these restrictions should demonstrate clear biological necessity.

Drift Fleet Impact
Reducing available fishing area increases congestion, gear conflict, and safety risk for drift vessels while decreasing harvest efficiency.

Position
Oppose

Rationale
Further area restrictions reduce drift access without evidence of improved conservation outcomes and increase operational risk for the drift fleet .

Proposal 88 – Establish Additional Inseason Triggers for Commercial Restrictions in the Ugashik District

Summary
Proposal 88 would establish new inseason triggers that automatically impose commercial fishing restrictions in the Ugashik District.

Regulatory and Biological Context
ADF&G has acknowledged uncertainty in inseason run assessment and limitations in predictive precision.

Drift Fleet Impact
Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position
Oppose

Rationale
Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 89 – Modify Allocation Priorities in the Ugashik District

Summary
Proposal 89 would modify allocation priorities among commercial gear groups in the Ugashik District.

Regulatory and Biological Context
Allocation adjustments should be made independently of conservation designations and supported by clear biological or management justification.

Drift Fleet Impact
This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position
Oppose

Rationale

Using allocation changes as a conservation tool creates lasting impacts beyond the stated concern and disadvantages the drift fleet .

Proposal 90 – Expand Management Authority to Restrict Commercial Fisheries in the Ugashik District

Summary
Proposal 90 would expand management authority to impose additional commercial fishing restrictions in the Ugashik District.

Regulatory and Biological Context
ADF&G already holds broad emergency order authority to manage fisheries inseason when conservation objectives are threatened.

Drift Fleet Impact
Expanded discretionary authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position
Oppose

Rationale
Existing management authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

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Proposal 91 – Modify Commercial Fishing Time Restrictions in the Togiak District

Summary
Proposal 91 would modify commercial fishing time restrictions in the Togiak District during periods of conservation concern.

Regulatory and Biological Context
ADF&G currently manages fishing time in the Togiak District through emergency orders based on escapement performance. Existing authority allows for reductions in fishing time when conservation objectives are at risk.

Drift Fleet Impact

Additional time restrictions reduce drift fleet flexibility and economic opportunity, particularly as effort shifts between districts late in the season. Further compression of fishing periods increases congestion and safety risk without clear conservation benefit.

Position
Oppose

Rationale
Additional restrictions on fishing time concentrate conservation burden on the drift fleet without addressing biological drivers of stock performance or improving escapement outcomes .

Proposal 92 – Modify Commercial Fishing Area Restrictions in the Togiak District

Summary
Proposal 92 would impose additional commercial fishing area restrictions in the Togiak District.

Regulatory and Biological Context
Area restrictions are already used when necessary to protect escapement goals. Any expansion must demonstrate clear biological justification.

Drift Fleet Impact
Reducing available fishing area increases congestion, gear conflict, and operational risk for drift vessels while decreasing harvest efficiency.

Position
Oppose

Rationale
Additional area restrictions reduce drift access without evidence of improved conservation outcomes and increase operational risk for the drift fleet .

Proposal 93 – Establish Additional Inseason Triggers for Commercial Restrictions in the Togiak District

Summary
Proposal 93 would establish new inseason triggers that automatically impose commercial fishing restrictions in the Togiak District.

Regulatory and Biological Context

ADF&G has acknowledged uncertainty in inseason run assessment and limitations in predictive accuracy.

Drift Fleet Impact
Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position
Oppose

Rationale
Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 94 – Modify Allocation Priorities in the Togiak District

Summary
Proposal 94 would modify allocation priorities among commercial gear groups in the Togiak District.

Regulatory and Biological Context
Allocation changes should be evaluated independently of conservation designations and supported by clear biological or management justification.

Drift Fleet Impact
This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position
Oppose

Rationale
Using allocation changes as a conservation tool creates lasting impacts beyond the stated concern and disadvantages the drift fleet .

Proposal 95 – Expand Management Authority to Restrict Commercial Fisheries in the Togiak District

Summary

Proposal 95 would expand management authority to impose additional commercial fishing restrictions in the Togiak District.

Regulatory and Biological Context
ADF&G already possesses sufficient emergency order authority to manage fisheries inseason when conservation objectives are threatened.

Drift Fleet Impact
Expanded discretionary authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position
Oppose

Rationale
Existing authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

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Proposal 96 – Modify Commercial Fishing Time Restrictions in the Naknek–Kvichak District

Summary
Proposal 96 would modify commercial fishing time restrictions in the Naknek–Kvichak District during periods of conservation concern.

Regulatory and Biological Context
ADF&G already manages fishing time in the Naknek–Kvichak District through emergency orders informed by escapement performance and run timing. Existing authority allows managers to reduce fishing time when necessary.

Drift Fleet Impact
Additional time restrictions limit drift fleet mobility at a point in the season when other districts are slowing or closed. Time compression increases congestion, gear conflict, and safety risk while reducing economic opportunity.

Position
Oppose

Rationale
Further restricting fishing time concentrates conservation burden on the drift fleet without addressing underlying productivity issues or improving escapement outcomes .

Proposal 97 – Modify Commercial Fishing Area Restrictions in the Naknek–Kvichak District

Summary
Proposal 97 would impose additional commercial fishing area restrictions in the Naknek–Kvichak District.

Regulatory and Biological Context
Area restrictions are already available as a management tool when escapement protection is required. Additional restrictions must demonstrate clear biological necessity.

Drift Fleet Impact
Reducing available fishing area increases congestion, gear conflict, and operational risk for drift vessels while decreasing harvest efficiency.

Position
Oppose

Rationale
Additional area restrictions reduce drift access without evidence of improved conservation outcomes and increase operational risk for the drift fleet .

Proposal 98 – Establish Additional Inseason Triggers for Commercial Restrictions in the Naknek–Kvichak District

Summary
Proposal 98 would establish new inseason triggers that automatically impose commercial fishing restrictions.

Regulatory and Biological Context
ADF&G has documented uncertainty in inseason run assessment and limitations in predictive accuracy.

Drift Fleet Impact
Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position
Oppose

Rationale

Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 99 – Modify Allocation Priorities in the Naknek–Kvichak District

Summary
Proposal 99 would modify allocation priorities among commercial gear groups in the Naknek–Kvichak District.

Regulatory and Biological Context
Allocation changes should remain separate from conservation designations unless supported by explicit biological justification.

Drift Fleet Impact
This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position
Oppose

Rationale
Using allocation changes as a conservation tool creates lasting impacts beyond the stated concern and disadvantages the drift fleet .

Proposal 100 – Expand Management Authority to Restrict Commercial Fisheries in the Naknek–Kvichak District

Summary
Proposal 100 would expand management authority to impose additional commercial fishing restrictions in the Naknek–Kvichak District.

Regulatory and Biological Context
ADF&G already has sufficient emergency order authority to manage fisheries inseason when conservation objectives are threatened.

Drift Fleet Impact
Expanded discretionary authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position
Oppose

Rationale
Existing authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

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Proposal 101 – Modify Commercial Fishing Time Restrictions in the Nushagak District Outside Stock of Concern Conditions

Summary
Proposal 101 would modify commercial fishing time restrictions in the Nushagak District outside of formal Stock of Concern designations.

Regulatory and Biological Context
ADF&G already manages fishing time through emergency order authority based on escapement performance and run timing. Existing regulations provide sufficient flexibility to respond to conservation needs without standing restrictions.

Drift Fleet Impact
Imposing additional standing time restrictions outside of SOC conditions unnecessarily limits drift fleet access and reduces the ability to efficiently harvest surplus sockeye when conservation concerns are not present.

Position
Oppose

Rationale
Preemptive restrictions outside SOC conditions reduce drift opportunity without biological justification and undermine adaptive inseason management .

Proposal 102 – Modify Commercial Fishing Area Restrictions in the Nushagak District Outside Stock of Concern Conditions

Summary
Proposal 102 would impose additional commercial fishing area restrictions in the Nushagak District when no Stock of Concern designation is in effect.

Regulatory and Biological Context

Area restrictions are already available to managers when escapement protection is necessary. Applying restrictions outside conservation conditions requires clear biological justification.

Drift Fleet Impact
Reducing fishing area outside SOC conditions increases congestion, gear conflict, and operational risk for drift vessels while providing no demonstrated conservation benefit.

Position
Oppose

Rationale
Additional area restrictions outside SOC conditions unnecessarily constrain drift access and efficiency without improving escapement outcomes .

Proposal 103 – Establish New Inseason Triggers for Commercial Restrictions Outside Stock of Concern Conditions

Summary
Proposal 103 would establish new inseason triggers that automatically impose commercial fishing restrictions outside SOC conditions.

Regulatory and Biological Context
ADF&G has documented uncertainty in inseason assessment tools and predictive precision, particularly for Chinook salmon.

Drift Fleet Impact
Automatic triggers outside SOC conditions increase the likelihood of unnecessary closures and restrict drift operations based on uncertain indicators rather than demonstrated conservation need.

Position
Oppose

Rationale
Rigid triggers outside SOC conditions reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 104 – Modify Allocation Priorities in the Nushagak District Outside Stock of Concern Conditions

Summary
Proposal 104 would modify allocation priorities among commercial gear groups in the Nushagak District outside SOC conditions.

Regulatory and Biological Context
Allocation decisions should be based on long-term policy and biological performance, not implemented incrementally through regulatory changes unrelated to conservation need.

Drift Fleet Impact
This proposal risks reallocating opportunity away from the drift fleet without biological justification and establishes precedent that could permanently alter access.

Position
Oppose

Rationale
Allocation changes outside SOC conditions are unnecessary and create long-term impacts unrelated to conservation effectiveness .

Proposal 105 – Expand Management Authority to Restrict Commercial Fisheries Outside Stock of Concern Conditions

Summary
Proposal 105 would expand management authority to impose additional commercial fishing restrictions when no Stock of Concern designation is in effect.

Regulatory and Biological Context
ADF&G already possesses sufficient emergency order authority to manage fisheries adaptively inseason when conservation objectives require action.

Drift Fleet Impact
Expanding discretionary authority outside SOC conditions increases uncertainty and instability for the drift fleet without demonstrating a management gap.

Position
Oppose

Rationale
Existing authority is adequate. Expanding discretionary power outside conservation conditions undermines predictability and does not guarantee improved biological outcomes .

—

Conclusion

The positions I have taken on Proposals 44 through 105 are consistent, intentional, and grounded in both on-the-water experience and the Alaska Department of Fish and Game's own biological and management findings.

Across these proposals, a clear pattern emerges: many seek to further restrict the commercial drift fleet through expanded time limits, area closures, allocation changes, or automatic triggers, despite extensive documentation that the drift fleet is already the most regulated, most enforceable, and most responsive user group in Bristol Bay. In numerous cases, these restrictions would apply even outside formal Stock of Concern conditions, where no biological justification exists.

Conservation measures must be evaluated based on their ability to actually improve escapement outcomes. Repeated reductions to drift fishing time and access cannot correct productivity-driven declines, uncertainty in inseason assessment, or environmental factors that are outside the control of any fishery. When restrictions persist even in the absence of conservation concern, they function as access controls and allocation shifts rather than biological tools.

My comments reflect a clear priority of use: commercial drift fishermen first, followed by subsistence users, then other commercial gear types, local resident recreational users, non-resident recreational users, and lastly charter and self-guided charter operations. This priority reflects who bears the greatest regulatory burden, who is most accountable, and who has the longest-standing economic and cultural reliance on these fisheries.

Where proposals improve enforceability, efficiency, safety, or management clarity without reallocating opportunity or increasing conservation burden on the drift fleet, I have supported them. Where proposals concentrate access, reduce fleet mobility, or impose additional restrictions without demonstrable biological benefit, I have opposed them.

I respectfully request that the Board evaluate these proposals not in isolation, but cumulatively, with particular attention to how repeated regulatory changes disproportionately impact the same user group year after year. Long-term sustainability of Bristol Bay fisheries depends not only on meeting escapement goals, but on maintaining fair, enforceable, and economically viable access for Alaska's working fishermen.

Thank you for considering this testimony and for maintaining a management process grounded in science, equity, and the realities of fishing on the water.

Sincerely,

Dustin Connor

F/V Jumper
Bristol Bay Drift Gillnet Fisherman

PC55

Submitted by: Dustin Connor
Community of Residence: Petersburg

Dear Members of the Alaska Board of Fisheries,

My name is Dustin Connor. I am a lifelong Alaskan and a commercial drift gillnet fisherman with 27 years of experience, including 14 seasons in Bristol Bay and 11 as an owner/operator of the F/V Jumper. This statement provides a concise summary of my positions on Bristol Bay Finfish Proposals 44 through 105 and is intended to align precisely with the full written testimony and supporting documentation I have submitted.

In addition to my time on the water, I served for a decade as an elected director with Alaska Commercial Fisheries at the Agricultural Bank of Alaska. In that role, I worked directly with commercial fishermen statewide and saw firsthand how regulatory instability, access limitations, and cumulative restrictions affect vessel financing, permit values, intergenerational transfer, and long-term fleet viability. That experience informs my concern with proposals that incrementally restrict the most regulated fleet while favoring sectors that do not carry comparable regulatory, enforcement, or financial burden.

All proposals were evaluated using the same criteria: conservation effectiveness based on best available science, enforceability, operational safety and efficiency, equity in allocation, and long-term precedent. My priority of use is as follows: commercial drift fleet, subsistence users, other commercial gear groups, local resident recreational users, non-resident recreational users, and lastly charter and self-guided charter operations.

In general, I support proposals that improve drift efficiency, safety, enforceability, and the ability to harvest surplus fish without reallocating opportunity or imposing unnecessary restrictions. I oppose proposals that compress fishing time, shrink fishing area, impose automatic triggers based on uncertain inseason data, or use conservation designations to permanently shift access or allocation. Where sport fisheries are affected, I support restrictions only when paired with meaningful enforcement, accountability, and traceability.

Below is a concise list of my positions on each proposal. These positions match the detailed proposal-by-proposal testimony included in my full submission.

Proposal Positions Summary

44 – Oppose

45 – Oppose

46 – Oppose

47 – Oppose

48 – Support with Conditions

49 – Support

50 – Support

51 – Support

52 – Support
53 – Support
54 – Support
55 – Support
56 – Support
57 – Oppose
58 – Support
59 – Support
60 – Oppose
61 – Oppose
62 – Oppose
63 – Oppose
64 – Oppose
65 – Oppose
66 – Support with Conditions
67 – Support with Conditions
68 – Support with Conditions
69 – Oppose
70 – Oppose
71 – Oppose
72 – Oppose
73 – Oppose
74 – Oppose
75 – Oppose
76 – Support
77 – Support
78 – Oppose
79 – Oppose
80 – Oppose
81 – Oppose
82 – Oppose
83 – Oppose
84 – Oppose

85 – Oppose

86 – Oppose

87 – Oppose

88 – Oppose

89 – Oppose

90 – Oppose

91 – Oppose

92 – Oppose

93 – Oppose

94 – Oppose

95 – Oppose

96 – Oppose

97 – Oppose

98 – Oppose

99 – Oppose

100 – Oppose

101 – Oppose

102 – Oppose

103 – Oppose

104 – Oppose

105 – Oppose

This summary is provided to assist the Board in quickly understanding how my votes align with the complete record I have submitted. I respectfully request that these proposals be evaluated cumulatively, with particular attention to how repeated regulatory changes disproportionately impact the same user group year after year. Long-term sustainability of Bristol Bay fisheries depends not only on meeting escapement goals, but on maintaining fair, enforceable, and economically viable access for Alaska's working fishermen.

Thank you for your consideration.

Sincerely,

Dustin Connor

Owner/Operator, F/V Jumper

Bristol Bay Drift Gillnet Fisherman

Submitted by: Dustin Connor
Community of Residence: Petersburg

Corrected Public Comment – Bristol Bay Finfish Proposals 44–105

Dustin Connor – F/V Jumper

———

Proposal 44

Summary: Limits king salmon retention and adds reporting requirements.

Position: Oppose

Rationale: This proposal adds restriction without addressing underlying productivity issues and shifts conservation burden without measurable benefit to escapement or long-term fishery health.

Proposal 45

Summary: Extends registration deadlines in the Naknek–Kvichak District.

Position: Oppose

Rationale: Limits fleet mobility late in the season and concentrates access without improving conservation outcomes.

Proposal 46

Summary: Modifies Naknek–Kvichak allocation timing.

Position: Oppose

Rationale: Compresses opportunity and functions as access control rather than conservation.

Proposal 47

Summary: Extends EO-only fishing period.

Position: Oppose

Rationale: Removes management flexibility and disadvantages mobile harvest without biological justification.

———

Proposal 48

Summary: Modifies KRSHA drift/set ratios and gear distance.

Position: Support with Conditions

Rationale: Supported if ratios remain adaptive and do not become fixed allocation precedent; reduced anchor distance improves efficiency without reallocating fish.

Proposal 49

Summary: Dynamic drift/set ratio based on participation.

Position: Support

Rationale: Participation-based management aligns with equitable harvest and surplus control.

Proposal 50

Summary: Adds fish quality considerations to management.

Position: Support

Rationale: Quality directly affects economic sustainability and state revenue without harming escapement.

_____

Proposal 51

Summary: Allows extra drift net onboard in KRSHA.

Position: Support

Rationale: Improves safety and efficiency without increasing fishing power.

Proposal 52

Summary: Creates Upper Egegik River SHA.

Position: Support

Rationale: Provides a tool to harvest surplus fish and prevent waste.

Proposal 53

Summary: Allows targeted closures to address illegal fishing.

Position: Support

Rationale: Protects compliant fishermen and improves enforceability.

Proposal 54

Summary: Repeals obsolete Nushagak coho plan.

Position: Support

Rationale: Plans without data undermine management credibility.

Proposal 55

Summary: Removes remaining references to repealed plan.

Position: Support

Rationale: Regulatory cleanup improves clarity.

Proposal 56

Summary: Makes offshore boundary coordinates permanent.

Position: Support

Rationale: Improves enforcement certainty and reduces conflict.

Proposal 57

Summary: Applies setnet boundaries to drift.

Position: Oppose

Rationale: Unnecessarily restricts drift access without conservation gain.

———

Proposal 58

Summary: Aligns WRSHA trigger with OEG.

Position: Support

Rationale: Prevents overescapement and wasted surplus.

Proposal 59

Summary: Ensures drift access in WRSHA.

Position: Support

Rationale: Prevents structural exclusion unrelated to conservation.

Proposal 60

Summary: Increases setnet length in WRSHA.

Position: Oppose

Rationale: Expands fixed gear power without balancing drift access.

———

Proposals 61–65 (Nushagak SOC Ratchet Cluster)

Position: Oppose (All)

Rationale: These proposals further restrict commercial harvest despite documented evidence that Chinook shortfalls are productivity-driven and not correctable through additional drift closures.

———

Proposals 66–68

Summary: Sport fishery restrictions under SOC.

Position: Support with Conditions

Rationale: Supported only with meaningful enforcement, reporting, and accountability.

Proposal 69

Summary: Establishes recovery goal.

Position: Oppose

Rationale: Adds symbolic targets without enforceable mechanism.

Proposal 70

Summary: Extends Ugashik boundary.

Position: Support

Rationale: Improves management flexibility and access without reallocating fish.

_____

Proposals 71–74 (General Management District Restoration)

Position: Support (All)

Rationale: Restores management discretion, reduces reliance on rigid triggers, and supports economic and fishery longevity.

_____

Proposals 75–78 (Permit Stacking / Drift Flexibility)

Position: Support (All)

Rationale: Improves safety, efficiency, and fleet viability without increasing harvest pressure.

_____

Proposal 79

Summary: Expands offshore setnet distance.

Position: Oppose

Rationale: Increases conflict and constrains mobile harvest.

Proposal 80

Summary: Joint venture setnet operations.

Position: Oppose

Rationale: Allocation creep without conservation benefit.

Proposal 81

Summary: Alternate stationary gear test.

Position: Oppose

Rationale: Introduces new gear impacts without sufficient analysis.

_____

Proposals 82–91 (Vessel Safety & Modernization)

Position: Support (All)

Rationale: Vessel length, RSW, rollers, platforms, and safety specifications directly improve crew safety, seaworthiness, and operational stability and should not be opposed.

_____

Proposal 92

Summary: July 25 closure.

Position: Oppose

Rationale: Arbitrary time restriction unrelated to inseason performance.

Proposal 93

Summary: Increases Togiak fishing time.

Position: Support

Rationale: Supports surplus harvest and economic viability.

Proposal 94

Summary: Restricts EO authority.

Position: Oppose

Rationale: Reduces management flexibility.

Proposal 95

Summary: Registration restrictions.

Position: Oppose

Rationale: Limits access without conservation gain.

_____

Proposals 96–104 (Sport Restrictions)

Position: Support (All)

Rationale: Reduce unaccounted impacts and align sport fisheries with conservation responsibility.

Proposal 105

Summary: Bristol Bay King Salmon Plan.

Position: Support with Conditions

Rationale: Must not become a drift-only restriction tool and must include enforceable sport and charter accountability.

_____

Closing

These corrected positions prioritize fishery longevity, economic sustainability, subsistence opportunity, and state revenue, while supporting safety, modernization, and flexible management. Restrictions that erode viability without biological necessity undermine the public trust resource.

Dustin Connor

Owner/Operator, F/V Jumper

PC56

Submitted by: Scott Cook
Community of Residence: Craig, CO

I am writing in support of Proposal 102 regarding the Togiak River. I have fished the Togiak River for over 10 years. This Proposal just makes sense for everybody.

PC57

Submitted by: Brent Cornelison
Community of Residence: Athol, ID

Brent Cornelison, Set Net Permit Number S04T 60087

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Brent Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 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,

Brent Cornelison, Set gill net fisherman, Nushagak District

PC58

Submitted by: Emily Cornelison
Community of Residence: Athol, ID

Emily Cornelison, Set Net Permit Number S04T 60494

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Emily Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 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,

Emily Cornelison, Set gill net fisherman, Nushagak District

PC59

Submitted by: Ethan Cornelison
Community of Residence: Athol, ID

Ethan Cornelison, Set Net Permit Number S04T 60839

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Ethan Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 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,

Ethan Cornelison, Set gill net fisherman, Nushagak District

Submitted by: Sheryl Cornelison
Community of Residence: Athol, ID

Sheryl Cornelison, Set Net Permit Number S04T 65640

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Sheryl Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 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,

Sheryl Cornelison, Set gill net fisherman, Nushagak District

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Kathleen Cronen, and I am a set-net permit holder 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.

Our multi-generational family has fished on Ekuk Beach for over twenty years. We have three permits and three sites.

I am urging support for:

> Proposal 80: Joint-Venture Set-Net Operations. 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.
>
> Proposal 57: Orderly and Safe Fishing. There have been an increasing number of entanglements of drift and set-net gear in recent years. Proposal 57 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.
>
> Proposal 56: Predictable Spatial Boundaries. Proposal 56 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.

I am also urging the Members of the Board to consider the 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.

In addition to the above proposals and considerations, it is critical that the Nushagak Chinook Management Plan be allowed to continue without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, any meaningful assessment requires time and consistency. 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.

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,
Kathleen Cronen
Ekuk Beach, Nushagak District

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 98 – Naknek River King Salmon Bag Limit Modification

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 98.

I oppose Proposal 98 because it attempts to alter harvest composition in the Naknek River king salmon sport fishery without escapement data, without a management plan, and without evidence that current harvest levels are driving conservation concern.

1) There Is No Naknek King Management Framework To Anchor This Proposal

The proposal itself acknowledges:

• There is no escapement monitoring program

• There is no escapement goal

• There is no management plan

Without these fundamental tools, there is:

• No biological problem statement

• No measurable performance objective

• No way to evaluate effectiveness

Changing regulations under these conditions is policy-making in the dark, not science-based management. Before adjusting retention structure, ADF&G should first establish a Naknek king salmon assessment and management framework.

2) Sport Harvest Is NOT Increasing and Does Not Justify Additional Restriction

ADF&G Bristol Bay Sport Fish Division data for Naknek kings ≥20 inches shows:

2020 – Harvest 613 / Catch 1,680

2021 – Harvest 717 / Catch 1,113

2022 – Harvest 102 / Catch 943

2023 – Harvest 711 / Catch 2,372

2024 – Harvest 535 / Catch 2,742

5-year average harvest = 536 fish

Key realities:

• 2024 harvest was 535, not “700+” as claimed

• 2024 harvest is below the 5-year average

• Catch has increased while harvest has not

• Exploitation rate continues to decline

This suggests anglers are already releasing more kings voluntarily or under current regulation. There is no evidence of an escalating sport harvest problem.

3) Proposal 98 Is Unlikely To Provide Meaningful Biological Benefit

Proposal 98 does not reduce:

• Total annual harvest

• Daily limits

• Participation

• Catch

It only restricts how many kings ≥28 inches one angler may retain. Because ADF&G only reports retention ≥20 inches, exact large-fish retention is unknown. Using the 5-year average harvest of 536 fish annually and applying reasonable hypothetical modeling, Proposal 98 likely reduces large-fish harvest by approximately 10–40 fish annually, or roughly 2–7% of harvest. That is biologically insignificant and impossible to evaluate without escapement data.

If Naknek kings are truly in biological danger, Proposal 98 does not meaningfully help.

If Naknek kings are not in danger, Proposal 98 is unnecessary.

4) The Board Should Avoid Optics-Based Regulation

The Alaska Board of Fisheries has a long history of demanding:

1) Data

2) Clear biological objectives

3) Measurable outcomes

Proposal 98 provides none of these. It is an optics-based regulation intended to imply conservation rather than meaningfully achieve it, while avoiding the honest conversation that meaningful conservation—if needed—requires monitoring and management planning.

Conclusion

Until ADF&G establishes:

• Escapement monitoring

• Escapement goals

• A Naknek River king management plan

changes to harvest structure should not be implemented.

I respectfully urge the Board to reject Proposal 98 and instead prioritize building the management foundation necessary for responsible, measurable conservation, should it become necessary in the future.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 99 – Naknek River King Salmon Area Closure Expansion

Position: Oppose / Support Catch-and-Release Alternative

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 99.

I oppose Proposal 99 because it is built on incorrect biological assumptions, does not align with the actual timing and behavior of Naknek River king salmon, and represents a major permanent loss of opportunity without documented biological justification. However, I would support a catch-and-release only modification for this section if the Board is determined to take action.

1) The Proposal's Central Claim About "Fishing on Spawning Beds" Is Factually Incorrect

The proposal states that anglers are heavily exploiting actively spawning king salmon in late July and that this area contains critical spawning grounds.

That is not biologically accurate for the Naknek River.

• Naknek River kings traditionally do not begin spawning until mid-August or later

• The area between the current ADF&G marker and the proposed closure line is primarily a staging area, not a spawning reach

• Kings that stage here move away from this section when spawning begins

Closing a large section of river on the premise of protecting spawning fish when the fish in that area are not yet spawning is simply not biologically grounded.

If the concern is truly spawning bed protection, then proposals must reflect real spawning timing and location — not perceptions, assumptions, or frustration over fishing activity.

2) This Proposal Is Driven by Social Conflict, Not Demonstrated Conservation Need

Much of the proposal's justification is based on:

• dislike of seeing boats

• frustration with lodge activity

• moral objection to how others fish

• concern over user pressure optics

None of these are biological arguments.

ADF&G and the BOF have a long history of managing based on:

• escapement

• biology

• measurable performance

They have not historically closed major portions of productive fishing areas purely because one group dislikes how other users participate in the fishery.

3) There Is Still No King Escapement Monitoring or Management Plan

This issue continues to repeat across Naknek king proposals:

• There is no escapement monitoring program

• There is no escapement goal

• There is no king management plan for the Naknek

Without these, the Board cannot:

• define a biological problem

• set measurable outcomes

• evaluate effectiveness of regulations

Major permanent closures should not be based on perception and emotion. They should be based on fisheries management fundamentals. Proposal 99 offers none of those.

If Naknek kings truly need help:

The first step is establishing a management framework —

not closing large sections of river based on assumption.

4) The Proposal Incorrectly Claims Existing Restrictions Failed

The proposal argues that because previous restrictions did not “fix” the king run, further closures are required.

That logic assumes:

• the sport fishery is the primary problem, and

• escalating restriction will somehow fix a broader statewide king trend

The reality is:

• Many Alaska king stocks have experienced marine survival challenges

• Past regulations cannot be evaluated without escapement monitoring

• Failure to see obvious improvement does not prove that in-river sport fishing is the cause

This proposal mistakes “regulation escalation” for “management success.”

5) A Middle-Ground Alternative Exists if Precaution Is Desired

While I do not support the proposed closure, I do not support intentional harvest targeting actively spawning kings anywhere, and I support responsible conservation.

If the Board wishes to act conservatively in this reach without eliminating opportunity, a more reasonable approach would be:

Catch-and-Release Only

For the reach between the current downstream ADF&G marker and Rapids Camp.

This would:

• eliminate harvest concern

• maintain opportunity

• prevent unnecessary user conflict

• still recognize conservation caution

• align with the biological reality that fish here are staging, not spawning

This approach balances resource protection with reasonable public access.

Conclusion

Proposal 99 is built on incorrect biological assumptions about spawning timing and location, lacks a management foundation, and advances a socially motivated closure rather than a scientifically justified one.

Until ADF&G establishes:

• escapement monitoring

• escapement targets

• a Naknek king management plan

large permanent closures should not be implemented.

I respectfully urge the Board to reject Proposal 99. If the Board chooses to address concerns in this reach, I encourage a catch-and-release-only provision, not a complete closure.

Thank you for your time and your continued commitment to science-based fisheries management in Bristol Bay.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 105 – Bristol Bay King Salmon Management Plan

Position: Strong Support

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 105.

I strongly support Proposal 105 because it finally addresses the central issue facing Bristol Bay king salmon management: most major Bristol Bay king systems are being regulated without escapement monitoring, without escapement goals, and without a formal king salmon management framework.

For years stakeholders have come before this Board arguing over closures, bag limits, boundaries, and regulations — while repeatedly acknowledging that we lack the most fundamental tools of modern fisheries management. Proposal 105 does not pick winners and losers, does not pre-judge outcomes, and does not attempt to regulate based on perception. Instead, it directs the State to do what Alaska has

historically done best: build data-driven management systems grounded in biology, transparency, and measurable performance.

1) Bristol Bay Kings Deserve the Same Professional Management Structure Other Alaska King Stocks Have

Many major king systems in Alaska already operate under Board-approved management plans built on escapement goals, performance triggers, and structured in-season tools. Bristol Bay has some of the most important sport, subsistence, and personal use king fisheries remaining in Alaska — yet several key Bristol Bay rivers currently lack:

- escapement monitoring
- escapement goals
- stock status benchmarks
- defined conservation triggers
- liberalization triggers when runs are healthy
- a management plan that can be measured or evaluated

Proposal 105 simply asks the Board to bring Bristol Bay kings up to the management standard the rest of Alaska expects and deserves.

2) This Proposal Supports BOTH Conservation and Access

Unlike reactionary proposals that attempt to restrict fisheries based on perception, fear, or user conflict, Proposal 105 creates a framework that supports:

- conservative action when runs are weak
- stability and predictability for users
- stronger protection for subsistence needs
- opportunity when runs are healthy
- confidence in management decisions

It creates tools, not automatic closures.

It creates accountability, not politics.

3) This Is the Only Responsible Path Forward

Without escapement monitoring and management plans, this Board and ADF&G are repeatedly forced into difficult policy debates without the information necessary to make measured, credible decisions. That harms resource sustainability, public trust, economic stability, and long-term fisheries credibility.

Proposal 105 helps fix that.

4) This Proposal Aligns With the Board's Long History of Science-Based Management

Alaska's Board of Fisheries has consistently prioritized:

1) Data

2) Clear biological objectives

3) Measurable outcomes

Proposal 105 delivers all three. It brings structure, clarity, and responsibility to a system currently managed without formal guiding tools.

Conclusion

Bristol Bay king salmon deserve modern, science-based, transparent management. Proposal 105 gives ADF&G and the Board the direction and mandate needed to establish that framework.

This proposal is not about restricting opportunity. It is about creating the professional management foundation that ensures future opportunity, sustainable runs, subsistence protection, and long-term resource health.

I respectfully urge the Board to adopt Proposal 105.

Thank you for your time and for your continued commitment to responsible fisheries management in Bristol Bay and across Alaska.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 61 – Nushagak District King Salmon Stock of Concern Management Plan Changes

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 61.

I do not support Proposal 61. I fully support the goal of protecting and rebuilding Nushagak River king salmon, but this proposal represents an extreme, rigid, and economically severe restructuring of the Nushagak management plan without demonstrating that its provisions are either necessary or likely to achieve meaningful biological benefit.

1) I Support Saving Nushagak Kings — But the Tool Must Match the Problem

There is no disagreement that Nushagak kings are in serious trouble. I support strong conservation action.

However, conservation policy must be:

• biologically justified

• proportional to demonstrated benefit

• balanced with social and economic impacts

• flexible enough to respond to real-time conditions

Proposal 61 fails those standards.

2) Proposal 61 Replaces Adaptive Management With Rigid, High-Risk Shutdown Triggers

The existing plan gives ADF&G coordinated, data-driven tools that balance king protection with massive regional dependence on sockeye fisheries.

Proposal 61 would instead:

• remove reopening performance triggers

• force complete commercial shutdowns based on early-season projections

• require daily 12-hour closures regardless of in-season information

Early projection uncertainty is well-documented. Building rigid shutdown policy around projections invites major management and economic failures even when kings might ultimately meet or exceed targets.

This eliminates flexibility, removes ADF&G's ability to use judgment, and risks enormous unintended harm.

3) This Proposal Has Enormous Regional Economic Consequences Without Proven King Benefit

The Nushagak sockeye fishery sustains communities, families, and regional economies. Shutting it down or severely limiting it requires overwhelming proof that such action is necessary and effective.

This proposal:

• provides no measurable analysis of expected king benefit

• does not demonstrate that commercial timing modifications already implemented were inadequate biologically

• does not compare projected outcomes under existing plan versus proposed system

We cannot justify devastating a world-class sockeye fishery on assumption.

4) "The Current Plan Failed" Is Not Proven

Proposal 61 argues the current plan has "failed" because king returns remained low in 2023 and 2024.

That conclusion incorrectly assumes:

• inriver sport, subsistence, and commercial restrictions should have reversed a broader statewide king crisis

• marine survival, climate stress, and generational recruitment collapse are irrelevant

• any poor return is evidence of management failure

ADF&G and BOF both know:

• many Alaska king stocks have failed under little or no fishing pressure

• ocean survival conditions are a dominant driver in recent years

• absence of recovery does not equal mismanagement

Policy should not be reactionary simply because outcomes are painful.

5) Sport Fishery Language Does Not Balance This Proposal

The inclusion of sport retention prohibitions may make the proposal appear balanced, but the scale of economic and allocative impact overwhelmingly falls on the commercial sector.

This is not a neutral conservation framework. It is a fundamental reallocation proposal packaged as stock-of-concern management.

The Board has a responsibility to separate genuine conservation necessity from allocation restructuring.

Proposal 61 blends them.

6) A Better Path Exists

If additional conservation structure is needed in the future, it should be based on:

• continued improvement of assessment tools

• refinement within the existing plan

• carefully evaluated modifications

• adaptive flexibility for in-season management

• clear demonstration of biological benefit

Not permanent, rigid shutdown mechanics based on projections.

Conclusion

Nushagak kings absolutely deserve protection. I support strong management. I support conservation.

But Proposal 61 is not the right tool.

It is overly rigid, economically severe, dependent on uncertain projections, reallocates burden disproportionately, and does not demonstrate measurable improvement beyond the tools already available in the current plan.

I respectfully urge the Board to reject Proposal 61, while continuing to support strong, science-based conservation strategies for Nushagak River king salmon.

Thank you for your time and your continued commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 63 – Nushagak District King Salmon Stock of Concern Management Plan (Sport Fish Provisions)

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 63.

I appreciate the intent of this proposal and I fully support the goal of protecting and rebuilding Nushagak River king salmon. However, I do not support Proposal 63 because it hard-codes rigid regulatory restrictions into the sport fishery, removes necessary in-season flexibility, and advances structural rule changes without clearly demonstrating measurable biological benefit.

1) I Support Strong King Conservation — But It Must Be Scientifically Grounded and Flexible

Nushagak kings are a designated stock of concern. Conservation is appropriate and necessary. However, effective conservation policy must be biologically justified, linked to demonstrable outcomes, proportional to expected benefit, and flexible enough for ADF&G to respond to real-time run conditions. Proposal 63 does not meet those conservation standards.

2) The Proposal Removes Critical In-Season Flexibility

The Board very intentionally moved the sport fishery into Emergency Order management so that ADF&G could respond adaptively to changing run strength, real-time sonar trends, and environmental variability.

Proposal 63 would instead:

• codify mandatory “window” closure structures,

• prohibit retention of larger kings until a fixed inriver benchmark is achieved,

• and replace adaptive tools with static rule-making in a stock of concern system.

This greatly reduces management flexibility, removes important discretion from fisheries managers, and risks creating regulations that cannot effectively respond to the realities of an unpredictable and rapidly shifting stock.

3) There Is No Clear Evidence That These Measures Improve Escapement

This proposal assumes that tidal window closures, additional retention restrictions, and new reporting requirements will meaningfully increase escapement. However, it does not provide evidence demonstrating:

• that these measures materially improve passage or escapement,

• that they outperform the existing Emergency Order approach,

• or that they contribute meaningfully compared to other limiting factors affecting Nushagak Chinook productivity.

ADF&G and the Board should be cautious about creating permanent, rigid regulations that are symbolic in intent but unproven in outcome. Symbolic conservation is not the same as effective conservation.

4) Sport Fishery Adjustments Should Remain Under EO Authority

ADF&G’s Emergency Order authority is designed specifically for situations like this:

• stocks of concern,

• highly variable run timing,

• mixed-stock interactions,

• rapidly changing conditions,

• and complex interactions with sockeye and subsistence priority management.

Codifying rigid, one-size-fits-all rules reduces the State’s ability to make science-based in-season adjustments that match the actual run.

5) I Support Data Improvement, But Not Overregulation

Portions of Proposal 63 related to improving reporting and data accuracy have potential value. Better information benefits everyone. However, those ideas can be explored independently without permanently restructuring sport regulations or imposing unnecessary rigid closures.

Conclusion

I support strong conservation for Nushagak kings. I support responsible management. I support continued refinement of tools and continued commitment to stock rebuilding.

However, Proposal 63 is not the right strategy. It replaces adaptive, science-driven management with rigid regulation, lacks demonstrated biological benefit, and risks unnecessary harm to the guided and recreational sector without clear conservation gain.

I respectfully urge the Board to reject Proposal 63 while continuing to support strong, flexible, science-based management for Nushagak River king salmon.

Thank you for your time and continued commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 65 – Nushagak District King Salmon Stock of Concern Management Plan and Allocation Adjustments

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 65. I have great respect for the history, culture, and economic importance of the Nushagak District set gillnet fishery and recognize the real hardship that many families and processors have experienced under recent management conditions. However, I respectfully oppose Proposal 65 because it attempts to solve allocation and economic equity issues inside a King Salmon Stock of Concern framework that must first and foremost remain biologically driven, unified, and conservation-focused.

1) The Nushagak King Stock of Concern Plan Must Remain Unified and Scientifically Grounded

The Nushagak stock-of-concern management structure was deliberately built around unified triggers, shared conservation responsibility, and in-season flexibility for ADF&G. Proposal 65 would fragment this system by establishing different timing triggers for set gillnet versus drift gillnet fleets, removing window protections at fixed calendar dates, and restructuring allocation calculations mid-crisis. These changes would weaken the structural integrity of the king conservation plan, reduce clarity for enforcement and management, and risk undermining consistent biologically grounded decision-making.

2) Proposal 65 Is Primarily an Allocation Proposal Wrapped in a Conservation Program

This proposal is driven largely by allocation outcomes and economic harm concerns rather than clearly demonstrated biological necessity. The Board has historically been careful about allowing allocation restructuring inside emergency conservation frameworks. That caution is warranted here. Allocation equity discussions are absolutely legitimate, but they should occur in the appropriate venue—not by weakening a critical stock-of-concern management tool while the stock remains in serious decline.

3) Biological Consideration: Protecting the Later Portion of the Chinook Run Matters

A key biological consideration that must guide Nushagak king management is that the later portion of the Chinook run is disproportionately important to escapement and future productivity. Early in the run, a high proportion of returning kings are often smaller jacks, which contribute relatively little to total spawning biomass. As the run progresses, a greater share of the returning fish are larger, older adult Chinook, particularly females, which produce dramatically more eggs and therefore provide far greater reproductive value. Chinook salmon fecundity scales strongly with body size, and studies consistently demonstrate that larger females contribute significantly more eggs per fish than smaller individuals. Protecting these later-arriving adult components of the run is therefore more consequential for escapement, genetic integrity, and long-term stock productivity than focusing conservation measures solely on earlier, jack-dominated portions of the run. (See Ohlberger et al. 2020, Transactions of the American Fisheries Society, documenting differential fecundity among Chinook salmon and the disproportionately higher reproductive value of large females.)

Proposal 65's attempt to relax protections after fixed calendar points risks misaligning management with biological timing, especially in variable run years.

4) Managers Need Flexibility, Not Rigid Gear-Specific Carveouts

ADF&G already has tools to adaptively manage in-season using emergency order authority, integrating sonar performance, timing, run shape, and king passage conditions. Codifying fleet-specific timing advantages, removing protections on fixed dates, and carving out allocation rules inside conservation packages would reduce management flexibility at a time when flexibility is crucial.

Conclusion

I support the long-term stability of the Nushagak District set gillnet fleet. Their hardship is real, their cultural presence matters, and their role in the regional economy is significant. But protecting and rebuilding Nushagak king salmon must remain the priority, and that requires a unified, biologically driven, and conservative framework.

For these reasons, I respectfully urge the Board to reject Proposal 65 while continuing to support strong, science-based management of Nushagak River king salmon and pursuing allocation discussions in appropriate, non-Stock-of-Concern venues.

Thank you for your time and your commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AL

Proposal 66 – Nushagak District King Salmon Stock of Concern Management Plan – Sport Fishing Gear Restrictions

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 66. While I appreciate the intent of the proposal and the experience of the proposer, I respectfully oppose Proposal 66. The proposal would significantly restrict sport fishing gear and methods under the King Salmon Stock of Concern plan despite the fact that existing ADF&G research indicates that current catch-and-release practices do not produce high levels of release mortality in the Nushagak River fishery.

1) ADF&G's Own Science Shows Catch-and-Release Survival is Already High

ADF&G conducted a multi-year radio-telemetry study of Chinook salmon caught and released in the lower Nushagak River sport fishery in 2017 and 2018. That study demonstrated that short-term survival of released Chinook was high, with a pooled survival estimate of approximately 93.4 percent (i.e., roughly 6–7 percent mortality). Year-specific estimates were similar and consistent across study years. This work replaced earlier assumptions and demonstrated that current angling methods on the Nushagak do not cause high release mortality.

In other words, the premise that current gear practices are causing large numbers of Chinook to die following release is not supported by ADF&G's own science.

2) Most Released Fish Are Jacks, Not Large Adult Kings

It is also important to understand what fish are actually being released in the Nushagak sport fishery. Based on both ADF&G advisory discussions and extensive on-the-river experience, the majority of released Chinook in this fishery are smaller jacks rather than large adult kings. Large kings over 28 inches are relatively rare in the fishery in recent years, even on the best days of the season.

I have guided on the Nushagak River since 2009. Even in strong fishing years, we may only release a handful of fish over 28 inches across an entire peak period. The idea that banning bait, scent, or barbed hooks would meaningfully "save" a large number of adult Chinook simply does not align with what actually occurs on the river.

3) Gear Restrictions Would Add Burden Without Demonstrated Biological Benefit

ADF&G's study already shows that released Chinook are largely surviving under current practices. Most of the fish released are jacks, which contribute much less to overall spawning biomass compared to adult females. There is no clear scientific evidence that the specific gear restrictions proposed here would materially change adult survival or measurably benefit escapement.

When managing a stock of concern, it is important that restrictions be evidence-based and proportional to demonstrated biological need. Proposal 66 does not meet that standard.

Conclusion

I fully support responsible, science-based conservation of Nushagak River king salmon. However, Proposal 66 imposes restrictive "methods and means" regulations without demonstrating that they would

meaningfully improve adult Chinook escapement or survival beyond what is already achieved under current practices.

ADF&G's own telemetry research shows that catch-and-release mortality in this fishery is low. Most released fish are smaller jacks rather than large, fecund adults. For these reasons, I respectfully urge the Board to reject Proposal 66.

Thank you for your consideration and continued commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 67 – Nushagak / Mulchatna Chinook Restrictions

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 67. While I respect the authors and appreciate the conservation intent behind this proposal, I oppose Proposal 67 primarily because it would prohibit king salmon retention in the lower Nushagak River when escapement projections fall below 55,000 fish, relying heavily on sonar performance and projection systems that ADF&G has documented as uncertain for king salmon enumeration.

1) Proposal 67 Ties Major Restrictions to a Projection System ADF&G Has Acknowledged Is Uncertain

ADF&G's recent Nushagak Chinook Stock Status reports (including SP25-18 and related Board of Fisheries briefing documents) clearly describe the difficulty of accurately estimating king salmon abundance using the Portage Creek sonar program. The department has explicitly acknowledged:

• enumeration error increases substantially in years of high sockeye abundance

• species apportionment challenges affect accuracy

• uncertainty bands in estimates are wide enough that management triggers may not always reflect true in-river abundance

ADF&G's own technical analysis demonstrates that Nushagak Chinook sonar projections contain a meaningful degree of uncertainty, especially during intense sockeye passage. Building rigid, high-consequence sport fishery closures off those projections is risky and may not reflect biological reality on the river.

2) This Proposal Would Unnecessarily Remove Retention Opportunity in the Lower River

Proposal 67 would ban bait, prohibit retention, and maintain only catch-and-release in the lower river even when in-season sonar projections—which are known to struggle with precision—suggest escapement may miss the lower SEG bound. I do not believe it is appropriate to automatically eliminate all retention opportunity for the entire lower river based on projection systems that ADF&G itself has flagged as unreliable for management precision.

3) The Upper River Closure Concept Is Reasonable; The Lower River Retention Ban Is Not

Protecting exhausted, late-run spawners in the upper Mulchatna and upper tributaries is reasonable and biologically defensible. However, Proposal 67 goes further by imposing river-wide retention prohibitions tied to uncertain projections.

ADF&G already has emergency order authority to act if run collapse becomes clearly evident. Mandating full retention prohibitions by regulation—based on a system widely acknowledged to be statistically challenged—is unnecessary and excessive.

4) Conservation Measures Must Be Proportional and Justified

I fully support conservation of Nushagak kings. However, regulatory restrictions should be supported by reliable assessment tools, be proportional to demonstrated risk, and avoid unnecessary loss of opportunity. Proposal 67 does not meet that standard.

Conclusion

Nushagak king conservation is important, and upper-river protections for vulnerable spawning fish may warrant consideration. However, tying lower-river retention prohibitions to sonar-based escapement projections that ADF&G has formally documented as uncertain is neither sound management practice nor fair to anglers.

For those reasons, I respectfully urge the Board to reject Proposal 67.

Thank you for your time and continued commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump
Community of Residence: King Salmon, AK

Proposal 69 – Adopt Recovery Goal for Nushagak River King Salmon

Position: Support

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 69. I strongly support Proposal 69 because it establishes clear, science-based recovery criteria for Nushagak River Chinook consistent with the Department's Stock Status and Action Plan recommendations.

1) This Proposal Brings Structure, Accountability, and Clarity

When the Nushagak Chinook Stock of Concern designation was adopted, ADF&G recommended a recovery framework defining how and when the system should transition out of conservative management. However, those exit criteria were never formally codified. Proposal 69 corrects that gap.

By adopting objective recovery benchmarks—meeting the 55,000 SEG lower bound in either three consecutive years, or four out of six years, and expected to continue being met—the Board creates a stable, transparent standard that is biologically meaningful, administratively consistent, and publicly understandable. This strengthens confidence in both the management process and in recovery planning.

2) This Proposal Aligns With ADF&G's Own Science and Guidance

These recovery criteria were developed and recommended by ADF&G scientists. They reflect the same biological logic used elsewhere in Alaska fisheries and follow the principles of 5 AAC 39.222, the Statewide Sustainable Salmon Policy.

Codifying that framework ensures that recovery standards remain grounded in science, decision-making is protected from short-term political or user-group pressure, and managers, fishermen, and the public understand what recovery truly means.

3) This Proposal Does Not Automatically Add Restrictions

Importantly, Proposal 69 does not impose new direct closures, allocation changes, or gear regulations by itself. It simply ensures that, while the stock remains in a concern status, management remains conservative and recovery is judged against a clear biological standard. ADF&G retains flexibility under emergency order authority to manage real-world conditions while operating inside a structured recovery framework.

4) Consistent Standards Build Trust

Clear, measurable recovery criteria create confidence for all users—subsistence, sport, and commercial alike. Everyone benefits from knowing the goals, the benchmarks, and the path forward.

Conclusion

Proposal 69 formalizes a scientifically supported recovery goal, strengthens consistency in management, and ensures conservative stewardship while providing clarity to all user groups.

For these reasons, I respectfully urge the Board to adopt Proposal 69.

Thank you for your time and commitment to sustainable fisheries management.

Respectfully submitted,

Justin Crump

PC63

Submitted by: Deven Damerau
Bristol bay permit holder
Community of Residence: naknek

please appose 44,61-68

PC64

Submitted by: Tristan Demers
Community of Residence: Bellingham Wa

I oppose prop 44 and 61-69, we can't restrict fishing anymore to try and save a few kings. We're already letting too much early sockeye upriver as it is. No way this makes sense

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PC65

Submitted by: Nicholas Dowie
Dowie Fisheries, LLC
Community of Residence: Ekuk, AK/Laramie, WY

Chair Carlson-Van Dort and Members of the Board,

My name is Nicholas Dowie. I am a lifelong 4th generation set gillnet fisherman in the Nushagak District. My family has been fishing in Ekuk since 1955. I first became a permit holder in 1996, my wife is a permit holder and my children. Our family business, Dowie Fisheries, LLC has 5 family permits.

Family owned operations in Ekuk have stayed consistent over the year. The relationships on the beach are long-standing and storied. Almost everyone on the beach has grown into the fishery since infancy. For many of us, this is our forever home and the one thing that brings the most consistency to our lives.

Our primary concerns stems from recent changes to management that have affected the future sustainability of this fishery for us and our children. We have lost much of our harvest share in the Nushagak. Because of this, we are limiting our comments, at this time, to four specific proposals that help fishermen in Ekuk.

Below are our comments for these specific proposals.

56: Support. This boundary line was necessary for Ekuk based on coastal erosion and inconsistency of the previous boundary line. Without this boundary almost everyone on the beach would have needed to move their historical "outer end" shore ward. This would have been a tragedy, as it would have furthered limited our harvest while abandoning the traditional establishments of our sites. This seaward boundary is now fixed and not arbitrary. Additionally, this proposal was agreed upon during the last meeting cycle and had both drift and set gillnet support. This specification should be adopted and the sunset clause removed.

57: Support. Protection for set gillnet operations is critical. Ekuk currently does not have any restrictions for a buffer between drift and set gillnet gear. Every year, gear is damaged on the beach and results in lost fishing time for set gillnet fishermen. Ekuk has had many challenges in recent years and would greatly benefit from having a clear and enforceable boundary to prevent this type of unnecessary loss.

65: Support with amendments. This proposal is about maintaining the allocation and management, not the stock of conservation concern management plan. Allocation has protected the set gillnet fleet for decades. It was specifically set up so the stationary user group would be protected from a high influx of drift vessels in the Nushagak. We have seen record years for drift vessels recently, and this has greatly impacted our historic share of the harvest. Without the past protection from the allocation plan, Ekuk would have likely lost its local processor. Any attempts to turn Ekuk into a buying station or moving fish off the beach result in diminished quality and value for our salmon. Loss of our onshore facility would be catastrophic. Additionally, Ekuk is known in the industry as having one of the best sockeye products in the Bay, this is because no tenders are used and fished are processed almost immediately after harvest.

Reestablishing and maintaining the allocation in the future is critical. Over recent years, the loss of harvest share has impacted many set gillnet fishermen, but Ekuk has been impacted the most.

80: Support. This would allow more flexibility and versatility for small set net operations. This would allow for efficiencies in their operations such as comingling their harvests and in deliveries to a tender or processor.

Thank you for your service, time and consideration.

Nicholas Dowie

PC66

Submitted by: David Driscoll
Community of Residence: king salmon

concerning pro 44,61-68

obviously the science is not in yet to have a change in policy this alone should negate any discussion of prop 44,61-68.

on a historic bases and fishing the bay since 1988 and fishing Nush for many years, most recently for the past 10-12 years for sockeye and including most of the early years I fished for the king season. The problem doesn't seem to me to be the gill netters as history bears out but rater high seas interception. the evidence of this is irrefutable and I'm sure is in the boards possession. By catch from the gill net fisheries is insignificant compared to the high sea fisheries.

As to why it's a bad idea economically, Over escapement, as a biologist I studied population dynamics in the aquatic environment while working for the EPA. findings are irrefutable and can be born out from history with the kvichak river system when 10milion escaped sockeye salmon where allowed in the 90s for a few years what followed was a terrible crash of sockeye population for (again I unfortunately I was effected) quite a few years which forced economic hardship upon the local and remote fishers that relied on the kvichak for their livelihood.

because of these reasons I am against this proposal being adopted.

thank you for your time

PC67

Submitted by: Dylan Dunsmore
Community of Residence: Bristol Bay

44, 61,62,63,64,65,66,67,68

These will drastically effect the forthcoming bristol bay sockeye runs, and undermine the vast efforts of multiple parties: of managing, forecasting, and preserving the chinook salmon

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Submitted by: Ken Dunsmore
Community of Residence: colorado

proposal 61

This proposal, while having good intentions to help revive the King salmon returns, is just short of RIDICULOUS. Putting the proposed restrictions on the commercial fleet prior to July 4 is ignoring the fact that the TOP 3 single day harvests have all been PRIOR TO JULY !st!!!! implementing this proposal will GUARANTEE over escapement of both the Wood and Nushagak rivers leading TO THE DECLINE OF BOTH RIVERS SOCKEYE RUNS!!!

This proposal is a DISASTER. im using my 40 YEARS of bristol bay fishing experience to formulate this opinion.

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

Madam Chair and Members of the Board,

The Ekuk Beach Fishermen's Association (EBFA) respectfully submits these comments on behalf of our 70 members and the multi-generational set-net families who fish Ekuk Beach in the Nushagak District. We are deeply invested in Ekuk, the Bristol Bay watershed, and the long-term sustainability of Alaska's fisheries.

Ekuk is a seasonal community 16 miles South of Dillingham that supports approximately 500 seasonal jobs. It is a meaningful economic driver within the district. The Ekuk set-net fleet includes 103 permits that primarily deliver to Alaska's Best Seafoods, and the fleet includes substantial local participation (including watershed residents, 43%, and other Alaska residents, 26%) tied to community stability and local infrastructure.

EBFA's priorities for this cycle are straightforward: (1) maintain stability and allow the Nushagak Chinook framework to be evaluated on an appropriate biological timeline; (2) adopt proposals that support an orderly and safe fishery; and (3) acknowledge and address the compounding economic and community harm caused by persistent missed set-net allocation in the Nushagak District.

Maintain Stability in the Nushagak Chinook Management Plan

EBFA supports allowing the Nushagak Chinook management framework to be evaluated against Chinook biology. Chinook are long-lived fish, and credible evaluation requires a management horizon that reflects their 7-year life cycle. We also note that the current Stock of Concern approach and associated regulatory structure emerged from one of the most extensive public and technical review processes in recent Bristol Bay history. The Board formed the Nushagak-Mulchatna King Salmon Committee to develop a comprehensive solution for management action relating to declining Chinook populations. The Committee worked for five years with broad stakeholder representation, and the resulting consensus Stock of Concern management framework and related measures were unanimously adopted by the Board in March 2023.

Importantly for the Board's evaluation: after three seasons under the new framework (2023–2025), BBSRI's published performance summary reports that the plan consistently

delayed the commercial season start by 2–5 days, enabling an additional 6,500–10,800 Chinook to pass annually before exposure to harvest, and that start triggers and Optimum Escapement Goal (OEG)-driven breaks corresponded to an average reduction of approximately 240 commercial fishing hours before July 5 (about a 42% decrease compared to the previous management structure).

EBFA urges the Board to avoid structural resets midstream and instead focus on (a) establishing an evaluation window that matches Chinook biology, and (b) improving implementation and equity outcomes within the existing framework.

Support for Proposal 56: Predictable and Enforceable Spatial Considerations

EBFA strongly supports Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary, passed unanimously by the Board in 2022, permanent. The coordinate line has been working on Ekuk Beach as a clear, enforceable seaward boundary. Making it permanent provides certainty for set-net site placement, drift operations, and enforcement. The former, tidally dependent, measurement structure was neither workable nor enforceable and contributed to confusion and ambiguity for all gear groups. A return to that structure would be a step in the wrong direction. The Alaska Department of Fish and Game (ADF&G) supports boundary lines based on GPS coordinates as clear and easy to enforce.

Support for proposal 57: Orderly, Safe, and Enforceable Fisheries

Proposal 57 complements that clarity by reducing the risk of entanglement, gear loss, and hazardous interactions near the beach. The proposal creates a clear, enforceable line and comprehensively describes key set-net gear vulnerable to damage by drift fleet interactions. These measures codify clear spatial rules and gear definition clarity that minimize conflict, prevent gear damage, and improve safety for everyone operating in close quarters.

The drift fleet in the Nushagak has steadily increased in numbers and horsepower over the past decade. Where we once shared the district with approximately 400 boats in a season, we now routinely share space and harvest with over 900. The fleet is still growing. Since 2021, the drift fleet has increased by more than 16% with an average increase of over 100 horsepower since 1990, with disproportionate increases in the non-resident fleet. New-technology jet engines have joined the fleet with 1,000+ horsepower and the ability to haul 50,000+ lbs of salmon. We are dealing with a new fleet that has drastically changed the fishery and must adapt our regulations accordingly.

In recent years, set-net fishermen along Ekuk and Clark's Point have experienced increasingly frequent and costly conflicts with drift vessels operating close to shore. As the drift fleet has grown in size, horsepower, and maneuvering capability, boats and nets are routinely passing through set-net lines, anchors, and pulleys. Even brief contact can cause catastrophic failure: broken running lines, torn web, displaced anchors, fouled blocks, and dangerous recoil under heavy tidal tension. These incidents result not only in damaged gear and lost income, but also in real safety hazards for crews working on the beach and in skiffs. Many of these events occur during short, high-value openings when inability to complete

repairs mean missing entire tides, sometimes compromising the remainder of a season if outer anchors cannot be safely accessed. Proposal 57 is necessary and overdue because these conflicts are no longer isolated accidents; they reflect structural crowding and unclear rules in the near-shore zone that can only be addressed by clearly separating gear types and preventing physical contact with set-net sites and equipment. ADF&G supports proposals that decrease gear conflicts and promote orderly fisheries.

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

EBFA supports Proposal 80 to authorize joint-venture set-net operations under defined conditions. This would allow two permit holders to register under a joint venture permit to share equipment and comingle their catch. Joint ventures help small, family-based operations adapt to short openings, rising costs, shrinking crews, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

The proposer has had productive, positive conversations with ADF&G. The Department is willing to clarify its delivery regulations to accommodate joint deliveries by either member of the joint venture.

Economic and Community Harm From Persistent Missed Set-Net Allocation

The Board has long recognized that allocation decisions have real community consequences. In the Nushagak District, the target allocation is 74% drift and 26% set.

Yet recent outcomes demonstrate sustained shortfalls for set-net fishermen. ADF&G data compiled by Wink Research & Consulting show that since 2021, the district set-net share has declined by an average of 6%, even when including set-net harvests in the Wood River Special Harvest Area (WRSHA).

These losses translate directly into processor instability, reduced family income, reduced local spending, and growing pressure on watershed residents to exit the fishery, which is precisely the kind of compounding harm the Board has repeatedly sought to avoid. When allocation exists on paper but is not achieved in practice over multiple years, the social and economic fabric of communities like those in Bristol Bay is weakened.

EBFA urges the Board to treat this as a material policy problem: a sustained failure to meet set-net allocation has predictable and preventable community consequences. Proposals that improve safety and order, and tools that improve resilience without increasing footprint, are part of preventing further harm while broader allocation and implementation issues are addressed.

Requested Board Action

EBFA respectfully asks the Board to:

1. Maintain stability in the Nushagak Chinook management framework and allow evaluation over a biologically meaningful time horizon, recognizing the extensive stakeholder process that produced the current structure and the documented performance effects to date.

2. Adopt Proposal 56 to make permanent the successful seaward boundary adopted by the Board in 2022.

3. Adopt Proposal 57 to improve safety, reduce gear conflict, and ensure clear, enforceable boundaries and gear definitions for an orderly fishery.

4. Adopt Proposal 80 as a limited mechanism to improve set-net operational resilience and safety without promoting consolidation or increasing fishing footprint.

5. Acknowledge and consider the documented economic and community harm caused by persistent missed set-net allocation in the Nushagak District, including the quantified losses borne by set-net families and the local economy.

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

Respectfully submitted,
Jamie O'Connor
Board Chair, Ekuk Beach Fishermen's Association

PC70

Submitted by: Feodor Erofeeff
Community of Residence: Oregon

The proposal 44.61 through 68 needs to be as is we need to look at trollers i had a deck hand that worked on one that targeted flounders the same time as the king's were coming through that was just out side off igushik ,he's said they were throwing out so many king's he could not believe that they were letting them drag there at that time of the year and if any thing needs looking after that is the west side and above Clark's point no deliveries of kings on the south line but at Clarks people that fish the west beach

December 29, 2025

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

Re: Opposition to proposal 61 and 62

Dear Chair Marit Carlson Van-Dort,

My name is Nels Evens, a lifetime commercial fishermen and Executive Director of Petersburg Vessel Owners Association (PVOA). These are my personal comments and not those of PVOA, which have been submitted separately. I have been an active participant in the Bristol Bay drift gill net fishery as a D permit holder from 2015-2017 and the owner/operator of a Bristol bay drift vessel from 2018-present. The Bristol Bay sockeye fishery has been one of the shining stars of Alaska's commercial fishing industry in recent years and has aloud me the opportunity to become a commercial fishing captain and further diversify my fishing business. I intend to keep my comments focused on proposals that can compromise the worlds last great wild salmon commercial fishery.

Proposals 61 and 62:

I am opposed to proposals 61 and 62. Proposals 61 and 62 would greatly reduce the commercial fishing opportunity for both the drift and set gill net fleets in the Nushagak and by extension, all other districts in the Bristol Bay fishery. If opportunity were to be substantially limited in the Nushagak, it would push vessels to other districts looking for fishing opportunity, splitting the fish pie into smaller slices for all districts.

The current Nushagak King Salmon Management Plan was developed under a Board sanctioned working group to develop a framework that could balance both the needs of king salmon escapement and sockeye harvest. The current management plan and its framework have been successful in increasing the number of kings up the Nushagak River through moderate reductions in commercial fishing time. The framework of the plan is structured by setting OEGs and escapement triggers to determine when and how to open and close commercial fishing opportunity in the Nushagak District.

Rather than replace the current management plan with something new that could cause great harm to the fleet, it would be more prudent to review the OEGs and fishery opening triggers to best optimize the balance of king escapement and commercial harvest of sockeye. The current plan has only been in place for 3 seasons, 2023-2025, and king escapement has increased, but that is not the only indicator of the plan's effectiveness. King returns from those increased escapement numbers are also

important and must be factored in. Due to the recency of the current management plan, 3 years, and the lifecycle of king salmon, 4-7 years, it is irresponsible to start managing under a completely new plan before knowing the true effectiveness of the current plan, especially when the escapement has been improving.

Thank you for allowing me the opportunity to share my comments with the Board and look forward to clarifying any lingering questions Board Members may have.

Thank you,
Nels Evens

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposal 44

Proposal 44 asks to "Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery and report all king salmon harvested".

Subsistence users already are required to obtain subsistence salmon permits[1] and to report their daily subsistence salmon catch totals[2]. In the past, ADF&G has sent out a threatening letter to subsistence permit holders who don't timely submit the report (October 31st deadline).

I disagree with a limit on subsistence harvesters. Subsistence has a priority over sport and commercial fishermen for good reasons. Nushagak river subsistence harvesters use king salmon for their food, family, and culture. Food and gas are expensive at Dillingham, and way more in the villages. When I see lear jets parked at the Dillingham airport at the peak of each salmon run, it's difficult to imagine the wealth difference between the lear jet passengers and Nushagak river subsistence harvesters.

I agree that all fishing groups should help conserve king salmon. Subsistence users, however, already help conserve king salmon by fishing only set nets limited to 10 or 25 fathoms on the beach almost entirely and dip nets limited to the beach[3]. Subsistence users pretty much miss king salmon staying in the channels.

As for commercial fishing, it is very difficult for me to keep king salmon for personal use because I have to travel back to Dillingham and freeze them. I could easily miss a red opening and lose money by doing that. I, however, do respect the opportunity for commercial fishermen from the villages who want to take kings back to their villages to do so.

I live at Dillingham and commercial and subsistence fish. Thank you.

Joseph R. Faith

[1] 5 AAC 01.005 (a) (subsistence salmon permit mandatory), and
[2] 5 AAC 01.005 (b) 1-7) and (c).
[3] 5 AAC 01.320 (c)(1)(B and C) (set nets 10 fathoms) and (c)(2) (set nets 25 fathoms), and 5 AAC 01.320(b) and 01.310 (d) (dip nets).

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposals 54 and 55

ADF&G asks for repeal of the Nushagak River Coho Salmon Management Plan, due largely to a lack of escapement enumeration data.

Nushagak coho salmon should still be managed as actively as possible. Nushagak coho salmon are extremely important for many reasons.

A major reason is that Nushagak coho spawn in and near the Pebble Mine project. Researcher Dr. Carol Ann Woody and her associates for the Nature Conservancy of Alaska captured 18 Coho salmon rearing on an unnamed tributary to the North Fork Koktuli on September 2, 2008.[1] The headwaters of the North Fork Koktuli overlie the proposed Pebble Mine project. During 2008-2010, they visited 137 sites and documented salmon including Coho and Chinook in 3 out 4 streams surveyed.[2]

ADF&G's proposal leads one to believe that Nushagak coho salmon have become unimportant. This allows the Pebble promoters to claim that Nushagak coho are not important anymore, and that Pebble mine has another reason to proceed. ADF&G is the fish champion in the eyes of citizens and should not be even an accidental participant to a claim against Nushagak coho in favor of Pebble mine.

Just because coho numbers aren't being enumerated doesn't mean coho numbers are down every year. But assuming they are down now, it doesn't mean they will always be down in the future. In 1973, the total Bristol Bay red run was 2.5 million.[3] In 2022, the total Bristol Bay red run was 79.1 million.[4] I'm confident that coho numbers will rebound, just as the red numbers did.

Nushagak coho are also a very important subsistence resource. Direct marketers commercially sell Nushagak cohos when the processors shut down. Commercial fishing for Nushagak cohos has occurred as recently as 2024.[5] The sport fishery catches cohos as well.

The Board of Fish should still make a regulation for Nushagak coho. It should make a statement about how important Nushagak Coho are. ADF&G should still manage for sustained yield as much as practical. Subsistence use should be given a priority. Commercial and sport harvests should be allowed in the discretion of ADF&G. ADF&G should also report the numbers of Nushagak Cohos that are caught in the subsistence, commercial, and sport fisheries no later than December 1 each year. ADF&G should operate the Nushagak River sonar for coho salmon if funding becomes available.

I live at Dillingham and commercial drift and subsistence fish.

Joseph R. Faith

[1] State of Alaska Department of Fish and Game, Division of Sport Fish, Nomination Form, Anadromous Waters Catalog dated September 12, 2008, p. 1

[2] National Park Service, Environmental Baseline and Mining in Remote Alaska, pgs. 5-7.

[3] Krasnowski and Randall, ADF&G Technical Data Report No. 22, Bristol Bay Sockeye Salmon 1973, p. 3.

[4] 2022 Bristol Bay Area Management Report, No. 23-08, p. 4

[5] 2024 Bristol Bay Area Annual Management Report, p. 5 (31,021 commercial harvest) and p. 64 (Appendix A7 showing coho commercial harvest from 2004-2024)

Joseph R. Faith

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposal 57, and to the extent it relates to Proposal 56, it too

I oppose Proposal 57's proposed revision of 5 AAC 06.331(n) "*and no part of a drift vessel, gillnet, line, buoy, or other device used to drift a gillnet may be shoreward of the following offshore locations while the drift gillnet is in the water:"*

The proposal fails to give proper notice and fails to provide a meaningful opportunity to comment. 99% of the public has no clue where the following offshore locations are. The offshore locations of the regulations are not listed in the proposal. A layman might think that the proposal does not affect him/her when it does affect him/her. The proposal apparently wants to impose criminal penalties on drift netters for violation of the proposed regulation if enacted. A layman should not be required to find the regulations at a law library or ADF&G's website. The proposal must give the public notice of those offshore locations.

The proposal does mention Ekuk beach. Ekuk beach, however, is not mentioned anywhere in the subsections of the regulation. Ekuk isn't even mentioned in the regulation subsections.

Both the proposal and regulation fail to mention Flounder Flats. Yet, a $1/5^{th}$ mile wide (1100 feet) and approximately a 9.9 mile long corridor is being proposed for Flounder Flats[1] (which is not part of Ekuk beach). Over 70 percent of the proposal is for Flounder Flats. Flounder Flats is well known by its name (not Ekuk beach). Flounder Flats should have been mentioned somewhere in the proposal to give notice and a meaningful opportunity to comment.

Further, the proposal fails to give meaningful notice whether it means a) going from each of the 19 latitude and longitude coordinates of the offshore locations shoreward in a straight line at a 90 degree angle, b) going from each set net in a straight line perpendicular to the beach out to a point where it intersects a line between two sets of latitude and longitude coordinates of the offshore locations, or c) connecting coordinates of one offshore location to the coordinates of another offshore location from the first location to the last one parallel to the shoreline to form a boundary line that cannot be crossed by a drift netter. It makes a big difference on which one is being proposed. A layman should not have to guess and then guess wrong.

If the proposal is creating a boundary over which no drift netter fishing a net can cross, the proposal violates the common use, no exclusive fisheries, and uniform applications of the law provisions of the Alaska Constitution. Alaska Const., Art. VIII Secs. 3, 15, and 17 This proposal creates a monopoly that will control the fish, water, and land under the water in a corridor totaling approximately 13.9 miles long for a small number of fishermen.

First, this monopoly effectively shuts out other set netters. Set net leases already give rights to lease holders to specific tracts to exclude other set netters. All set net lease sites are already taken for approximately the first 7.4 miles of the proposed area. The set net lease system is bad enough because it prevents other set netters from fishing an area and creates a nearly permanent property interest for the lease holders.

The set net tracts in the Ekuk/Flounder Flats area extend seaward roughly 450 feet. The prohibitions, however, don't stop at the end or side of these lease tracts.

Other set netters are prohibited from set netting "seaward" of a set net operated by another set net permit holder in the Ekuk area. 5 AAC 06.331(n) A second seaward prohibition guarantees the exclusion of other set netters from the Ekuk/Flounder Flats area--seaward of the offshore locations. 5 AAC 06.331(n).

[1] Pages 3 and 4 attached were obtained from the Alaska DNR website. They show the set net lease tracts from the Ekuk Range marker to Ekuk beach to Flounder Flats ending at Etolin Point. The Ruler on the website page was used to measure distances.

Set netters in the Nushagak district must keep a distance of 450 feet from another set net, whether its seaward, shoreward, or side ways. 5 AAC 06.335 No other district--Naknek-Kvichak, Egegik, Togiak, or Ugashik—has a 450 ft. distance. The other districts have a 300 ft. distance. 5 AAC 06.335

Other set netters in the Nushagak district must give 48 hours notice to transfer to fish in the Ekuk statistical area. 5 AAC 06.370 (a) and (l) This effectively deters other set netters from transferring into the Ekuk statistical area. No other district has a 48 hour transfer notice for set netters to fish in another location in their districts. Those set netters in other districts apparently can just move if they find an open spot to fish and can put the spot to productive use.

It is not just about control of the fish, but also the water, and the land under the water to exclude other set netters that's important.

Violation of a regulation can subject a set netter to fines and potential jail time in criminal court. AS 16.05.722 and 723.

Besides other set netters, drift netters now will be excluded from traditional drift fishing grounds by the proposed exclusive set net grounds for a small number of set netters. Drift fishermen fish the Ekuk beach area during the red season when no set netter is fishing due to the Ekuk cannery being plugged, or to weather. Roughly 14-20 years ago during fall fishing, no set netters usually were fishing the Ekuk beach. I fished it for cohos and pinks, and sold them to a processor or by direct marketing.

Flounder Flats has historically been fished by countless drift fishermen. Some drift fishermen fish in areas of Flounder Flats covered by the proposal where or when no set netter is fishing. There aren't even any sites for miles out toward Etolin Point (approximately 5.2 miles with no sites and 5.9 miles with only one site). Drift fishermen should have the opportunity to catch those fish when or where no set netter is fishing. A set netter at one end of the proposed area should not be able to prevent a drift netter from fishing miles away—up to 13.9 miles away.

Set nets are limited to 300 feet in length. This will often leave open water not being fished, subject to restrictions for distances between gear. Yet drift fishermen will be excluded from fishing these waters.

It's not just about control of the fish but also the water and the land under the water that's important. Nobody gets to control the land under the water, the water, and the fish that swim in the water over the land to the extent of this proposal. Nobody owns a fish until it's caught. The opportunity to fish in waters when or where no set netter is fishing within the Nushagak main district during a drift period should not be denied.

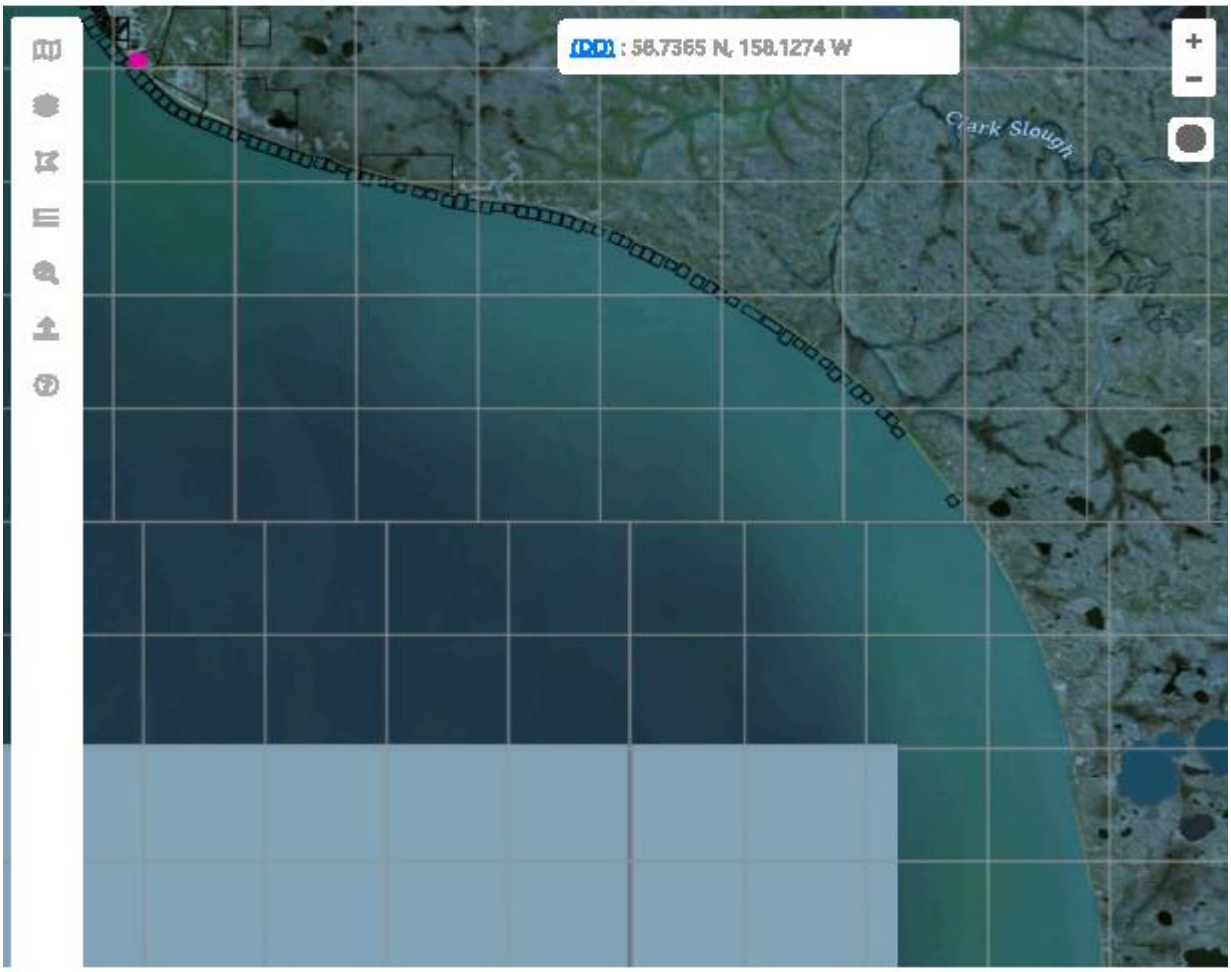
Violations of a regulation can subject a drift netter to fines and potential jail time in criminal court. AS 16.05.722 and 723.

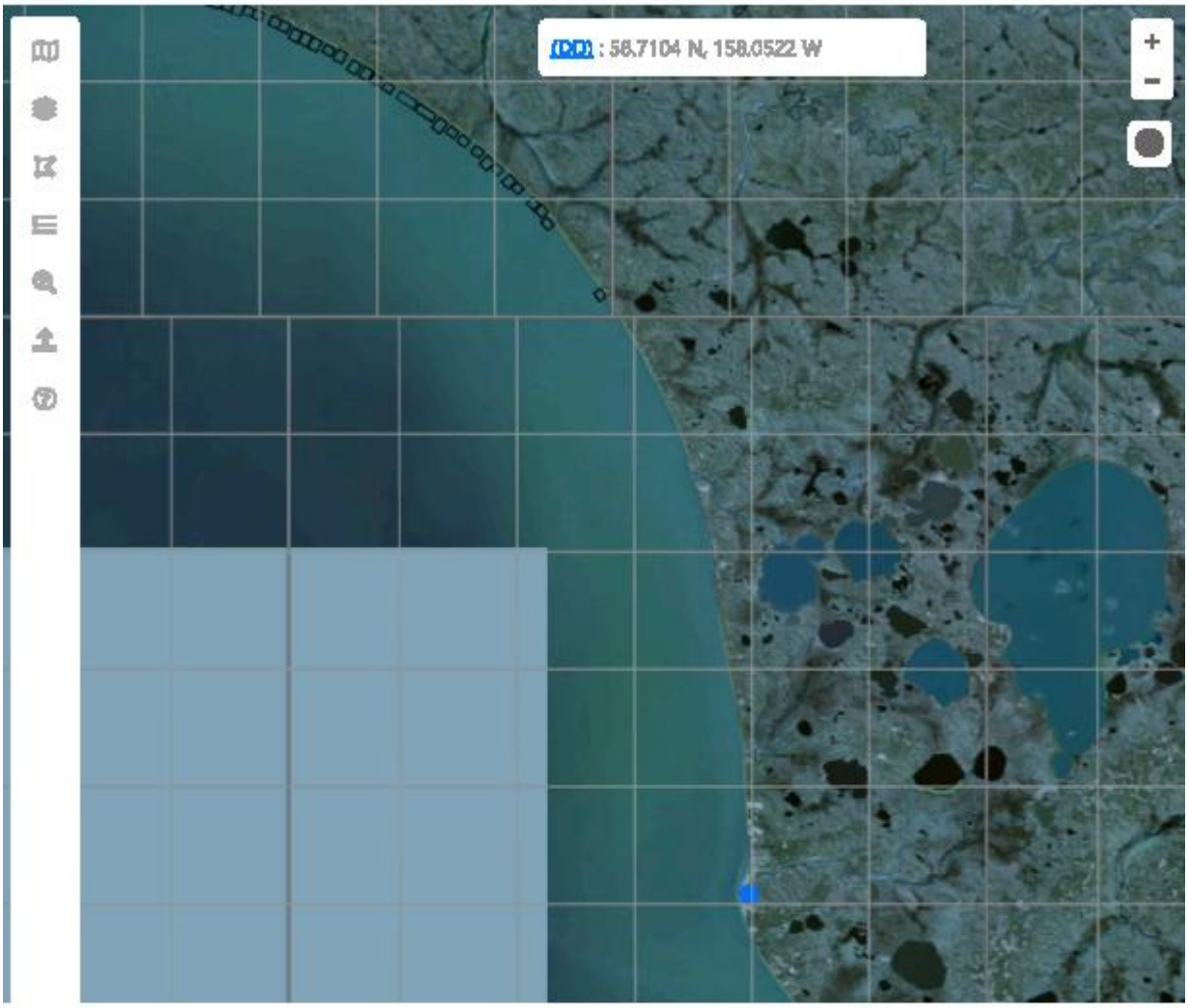
Once both set netters and drift netters are prohibited from the proposed area, the proponents will have completed the prohibitions by effectively excluding both set netters from the first 7.4 miles and drift netters from the entire 13.9 miles of the proposed Ekuk/Flounder Flats area. This kind of control to exclude both set netters and drift netters by a small group for several public resources to a large public area violates the common use, no exclusive fisheries, and uniform applications of the law provisions of the Alaska Constitution.

I do agree that reasonable restrictions should apply to the set net itself. I don't like it when anybody's net interferes with anybody else's net. Regulations, however, already provide for reasonable minimum distances between units of gear. No drift net may be operated within 300 feet of the side of a set net and 100 feet of the offshore end of the set net. The inshore Nushagak restriction is 100 feet. 5 AAC 06.335(a-b) I'm fine with these restrictions. In the Ekuk/Flounder Flats area, however, no drift gill net may be operated inshore of a set gill net at all. 5 AAC 06.335(c) This is over reach because when a set netter moves out, a drift netter should be allowed to fish inside of the set netter. Nobody owns a fish until its caught, or should get to control the water its swimming in and the land under the water its swimming in to the extent of this subsection 355(c).

I live at Dillingham and commercial drift fish. Thank you for your time and consideration.

Joseph R. Faith

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BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposals 61, 62, 63, 65, and 68

These proposals ask to modify the current Nushagak King Salmon Stock of Concern Plan.

The BOF took a hard look at the concerns for Nushagak king salmon at a meeting in November 2022 and a special one in March 2023. The BOF reviewed ADF&G's summary of the background of Nushagak king salmon, its basis for its recommendations, and its recommendations. ADF&G's recommendations were based on research, monitoring of the stock, and criteria for future delisting. Based on this and information from its meetings, the BOF developed the contents of the Plan contained in regulation 5 AAC 06.391.

It is too soon to determine whether the Plan will achieve its goals. We haven't even gotten through a full king salmon generation. The BOF's current plan also allows ADF&G flexibility in its management, which would be reduced by these proposals.

All user groups should contribute to the conservation of Nushagak kings. Commercial fishermen, however, have contributed to conservation by greatly reducing their harvest of Nushagak kings. (2023)5,785 kings, harvest below 20 year average; (2024) 2,438 kings, harvest below 20 year average ; (2025) 3,625 kings, harvest 86% below 20 year average[1]. Commercial fishermen have also sacrificed income in the interest of conserving Nushagak king salmon by starting later than usual to fish.

Frankly, it's been difficult to find numbers on the conservation efforts of the sport and subsistence users. I hope that the BOF obtains these numbers.

I've lived at Dillingham since 1992. I've subsistence fished since then. I've also drift fished predominantly the Nushagak district for over two decades. I thank you for your time and consideration.

Joseph R. Faith

[1] 2023 Bristol Bay Area Annual Management Report, p. 5 (also express that data indicated that Nushagak king run was larger than the sonar count of 31,499; 2024 Bristol Bay Area Annual Management Report, p. 4 (also expressing that data indicated that the Nushagak king run was larger than the final sonar count of 42,621), and 2025 Bristol Bay Salmon Season Summary, September 24, 2025, p. 2

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposals 75, 76, 77, and 78 That Seek To Allow/Expand Permit Stacking

I. No Legitimate Reason Exists For One Fisherman with Two Permits to Fish on One Boat Based On An Economic Factor.

No legitimate reason exists for one fisherman with two permits to fish on one boat based on an economic factor. Alaska statute 16.05.251(i) authorizing an "additional fishing opportunity" for permit stacking was done in part for the purposes of addressing "situations where salmon prices are falling."[1] Similarly, in 2002, United States Senator Ted Stevens said, "We have a price problem, and the price comes from competition overseas."[2] The Alaska constitution and statutes regarding limiting entry variously describe the economic factor in terms of "economic distress,"[3] "economic health,"[4] and "economic dependence."[5]

The fishery, however, is not now economically distressed. To the contrary, the fishery thrives economically. The exvessel value of the salmon harvest was an estimated $277 million in 2018, 64% above the 10-year average.[6] In 2019, the exvessel value was an estimated $303.5 million.[7] In 2020, the exvessel value was an estimated $141.1 million.[8] In 2021, the exvessel value was an estimated $260.7 millon.[9] The 2022 Bristol Bay estimated exvessel value amounted to $343.3 million (99% over the 20-year average.).[10] In 2023, the Bristol Bay exvessel value was an estimated $117.6 million.[11] The 2024 exvessel value was an estimated $128.3 million.[12] In 2025, the Bristol Bay exvessel value was an estimated $215.3 million—7 percent above the 20 year average of 200.7 million.[13]

Moreover, the estimated gross earning for Bristol Bay drift permits show that the fishery is strong. The top 10% of the permit holders grossed

$ 7 percent above 20 year average expected (2025)[14]
$251,818 (2024);
$260,209 (2023);
$538,240 (2022);
$465,564 (2021);
$291,453 (2020);
$414,204 (2019); and
$484,993 (2018).[15]

[1] See the comments of Representative Ralph Samuels, the sponsor of HB 251 (AS 16.05.251(i); Legislature (2005-2006) on 4/11/2005 at 8:49:01 AM.
[2] Anchorage Daily News, February 24, 2002, E-1, "Salmon Solution."
[3] Alaska constitution, Art. VIII Section 15 (limited entry for economic distress)
[4] AS 16.43.010 (economic health), and AS 16.43.290 (1) (economically healthy).
[5] AS 16.43.250 (a) (1) (economic dependence)
[6] 2018 Bristol Bay Area Annual Management Report, No. 19-12, p. 4.
[7] 2019 Bristol Bay Area Annual Management Report, No. 21-04, p. 5.
[8] 2020 Bristol Bay Area Annual Management Report, No. 21-16, p. 5.
[9] 2021 Bristol Bay Area Annual Management Report, No. 22-14, p. 4.
[10] 2022 Bristol Bay Area Annual Management Report, No. , p. 4.
[11] 2023 Bristol Bay Area Annual Management Report, No. 24-11, p. 4.
[12] 2024 Bristol Bay Area Annual Management Report, No. 25-17, p. 4.
[13] 2025 Bristol Bay Salmon Summary, p. 1.
[14] Id. The 2025 CFEC participation and earnings amounts are not available yet.
[15] CFEC, Fishery Statistics, Participation and Earnings, Quartile Tables, Salmon, S03T from 2018-2024.

Each fisherman, based on the cumulative gross earnings for the entire fleet, averaged

$ 7 percent above 20 year average expected (2025)
$110,111 (2024);
$105,030 (2023);
$218,892 (2022);
$188,208 (2021);
$120,511 (2020);
$173,571 (2019); and
$198,555 (2018).

We fish each year for about 3 weeks. Preseason preparation time depends on each person. Even considering fishing and preseason preparation time, there is 10 months left in the year, I believe, for other opportunities. Fishermen can earn more income or vacation in the sun on a beach somewhere with these other opportunities.

Why should fishermen expect a full year's income when we only fish 3 weeks and prepare for 5 weeks when we have 10 months off for other opportunities the rest of the year? Bristol Bay fishing pays well. Extrapolating, the top ten percent would have to gross another $1,933,200 for those other 10 months from other opportunities to do as well as they do from the opportunity of fishing each year, based on information for the period from 2018-2024.[16] Plus, they would have their fishing income.

Each fisherman in the entire fleet would have to gross another $796,340 for those other 10 months from other opportunities to do as well as they do from the opportunity of fishing each year.[17] Plus, they would have their fishing income.

It also must be emphasized that exvessel amounts may not include bonuses or price adjustments.[18] Bonuses and price adjustments dramatically increase the exvessel amounts. Those bonuses and price adjustments may be for chilling, bleeding, floating, production, and so forth.

For example, in 2025, bonuses and price adjustments were $.30 (chilling bonus), $.05 (bleeding bonus), and $.20 (price adjustment), totaling $.55/lb. The 2025 exvessel value used by ADF&G of $1.03[19] plus 55 cents totals $1.58/lb. The bonuses/price adjustment increases the exvessel amount by at least one-third.

Proposals talk about high expenses. Business owners know that expenses must be kept low. Over capitalization, however, results in excessive expenses. Half-million and million dollar boats that burn 40-60 gallons of fuel an hour create overcapitalization. Fishermen then want more fish by eliminating other fishermen to pay for their over expenditures.

Fishermen should be careful what they wish for. One corporation owning all the fishing rights is the most efficient economic model. Fish traps are the most economical and safest harvest method. Fishermen aren't actually needed.

However, the White Act protected fishermen from corporate ownership of all fishing rights in 1924.[20] Since 1959, the Alaska constitution protects fishermen through its no fish traps, no exclusive fisheries, and common use provisions.[21] Limited entry must be viewed in the context of other Alaska

[16] This figure was calculated as follows: $2,706.481 (top 10% totals added together for 2018-2024) divided by 7 years equals $386,640 (average fishing gross income for 2 months) times 5 (10 months divided by 2) equals $1,933,200.
[17] This figure was calculated as follows: $1,114,878 (fleet's cumulative gross added together for 2018-2024) divided by 7 years equals $159,268 (average fishing gross income for 2 months) times 5 (10 months divided by 2) equals $796,340.
[18] 2025 BB Salmon Season Summary, ("Prices may not included incentives for icing, bleeding, floating or production bonuses."), p. 1
[19] Id., Table 4, p. 5.
[20] Laws and Regulations for Protection of Fisheries of Alaska (Washington DC, Commerce Department, 1924, p. 9.
[21] Alaska Const., Ord. 3 (fish trap ban), Art. VIII Sec.15 (no exclusive fisheries and limited entry), and Sec. 3 (common use).

constitutional provisions that protect all fishermen, current and future, from placing a public resource in the hands of too few.

The 2004 Optimum Number Report notably provided: "If future economic returns in the fishery were expected to vary as economic returns varied over the entire 1983-2003 time period, the economic optimum number of permits would likely remain near current permit levels [1,857]."[22] Except for this forecast, as with weather forecasts sometimes, the Report's other forecasts were wrong.

No legitimate economic reason exists for a single fisherman to fish with two permits on one boat. There is no economic distress in the fishery now. Indeed, the economic factor supports eliminating dual permit ownership and returning to a single fisherman fishing with one permit on one boat.

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II. The Conservation Factor Fails to Justify a Dual Permit Operation for One Person on One Boat.

The conservation factor fails to justify a dual permit operation for one person on one boat for the purpose of reducing the amount of gear in the water. The Alaska constitution and statutes regarding limiting entry variously describe the conservation factor in terms of "resource conservation,"[23] "conservation," "allowable commercial take of the fishery resource," and so forth. The Bristol Bay salmon runs are strong:

2015	59.1 million[24]
2016	51.7 million[25]
2017	57. million [26]
2018	63 million (record)[27]
2019	56.4 million.[28]
2020	58.3 million fish[29]
2021	67.7 million (record)[30]
2022	79.1 million (record)[31]
2023	54.5 million[32]
2024	51.6 million[33]
2025	56.7 million[34]

By contrast, in 1973, the Bristol Bay run totaled 2.5 million.[35] Limited entry was enacted in 1973.

The salmon runs now do not support having a single fisherman with two permits on one boat. The salmon runs support a return to a single fisherman with one permit on one boat.

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[22] Bristol Bay Salmon Drift Gillnet Fishery Optimum Number Report, Executive Summary, CFEC Report 04-34, October 2004, at p. 6.
[23] Alaska constitution, Art. VIII Section 15 (resource conservation); AS 16.43.010 (a) (conservation); and AS 16.43.290 (2) (allowable commercial take of the fishery resource).
[24] 2015 Bristol Bay Area Annual Management Report, No. 16-13, p. 5.
[25] 2016 Bristol Bay Area Annual Management Report, No. 17-27, p. 4.
[26] 2017 Bristol Bay Area Annual Management Report, No. 18-11, p. 4.
[27] 2018 Bristol Bay Area Annual Management Report, No. 19-12, p. 4.
[28] 2019 Bristol Bay Area Annual Management Report, No. 21-04, p. 5.
[29] 2020 Bristol Bay Area Annual Management Report, No. 21-16, , p. 5.
[30] 2021 Bristol Bay Area Annual Management Report, No. 22-14, p. 4.
[31] 2022 Bristol Bay Area Annual Management Report, No. 23-08 , p. 4.
[32] 2023 Bristol Bay Area Annual Management Report, No. 24-11, p. 5.
[33] 2024 Bristol Bay Area Annual Management Report, No. 25-17, p. 4.
[34] 2025 Bristol Bay Salmon Season Summary (September 24, 2025), p. 1.
[35] Krasnowski and Randall, ADF&G Technical Data Report No. 22, Bristol Bay Sockeye Salmon 1973, p. 3.

III. Dual Permit Operations Largely Favor the "Well to Do" At the Expense of Poorer Fishers and Local Watershed Communities

Dual permit operations largely favor the "well to do" over the less affluent and local watershed communities. A huge flaw with dual permit operations is that the real determining factor is how "rich" you are.[36] The acquisition of a permit is not based on how much a fisher and local communities depend on the fishery, or other alternative jobs one has in the his/her region (AS 16.43.290(3).

Sure a few local residents have obtained permits at exorbitant prices. A lot more locals, however, would love to fish but cannot afford to buy a permit and boat. Men/women from watershed villages should not have to sit on the beach while they watch boats owned by non-local fishermen fish in front of their villages.

Dual permit operations are more realistically a devise that allocates the resource away from the small and poorer fishers, thereby creating serious economic impacts on local communities.

Past experience with permit stacking for setnetters bears this out. According to the CFEC, "… when permit stacking was allowed, the fair market value of set gillnet permits rose 64.2% from $25,700 to $42,200."[37] New entrants into the set net fishery "went to a historic low of 6% in 2011."[38] Permit stacking largely benefited non-residents and nonlocals, *not* local watershed residents. "Starting in 2010, when permit stacking regulations came into effect, the count of individuals who held two permits at year-end rose substantially, especially among nonresidents and nonlocals."[39] In 2012, ninety-two non-residents and nonlocals stacked permits, while only thirteen locals stacked them.[40]

Similar results occurred in the drift fishery with dual permit operations. Dual permit percent of earnings over single permit operations were either more than double or nearly double from 2018 to 2021.[41] Prior to dual permits, 25.4% of all new entrants were locals and 49.3% were non-resident in 2002. After dual permits were put in place, new entrants were 6.6% local and 60.1% non-resident in 2021.[42] Further, from 2018 to 2021, the dual operations count for both local permit holders went from 33 to 25, both nonlocal 57 to 81, and both nonresident from 232 to 238.[43]

Additionally, the Bristol Bay Economic Development Corporation (BBEDC) does a lot for local residents, more than one thinks. It, however, still comes up short with the difficult task of helping Bristol Bay residents obtain permits and boats. Hopefully, BBDEC will find creative ways to help local residents enter the drift and setnet fisheries.

Finally, I've lived at Dillingham since 1992. I've drift fished predominantly the Nushagak district for over two decades. I've largely fished single permit operations but have twice fished dual permit operations. I am submitting this comment in my capacity as an individual commercial fisherman only. I thank you for your time and consideration.

Joseph R. Faith

[36] S03T Drift permits $156,300 (Nov. 2025); S04T Set net permit $62,900 (Nov. 2025) CFEC website, Permit Values.
[37] CFEC Report No. 12-02-N, Bristol Bay Set Gillnet Permit Stacking, at page 15, November 2012.
[38] *Id.*, at page 13.
[39] *Id.*, at page 5.
[40] *Id.*, Table 1, at page 5.
[41] CFEC Bristol Bay Salmon Fisheries, 1975-2021, November 2022, Reid Johnson and Brad Robbins, Table 1-7, Earnings by Vessel and Operation Type 2004-2021, p. 11.
[42] *Id.,* at p. 8.
[43] *Id.* at p. 15.

Submitted by: Trever Flathman
Community of Residence: Manatee county

I am a Bristol Bay commercial fisherman writing to oppose Proposals 44 and 61–68.

The Nushagak District King Salmon Stock of Concern Management Plan was adopted by the Board of Fisheries in March 2023 after an extensive stakeholder process. That plan has not yet been in place long enough to evaluate its effectiveness over a full Chinook generation, and restructuring it now would be premature.

These proposals would substantially alter the existing management framework, reduce management flexibility, and create unnecessary risk to the commercial sockeye fishery. As noted, the impacts could be severe — including the potential loss of millions of sockeye salmon harvested by the fleet, with no demonstrated biological necessity to justify such drastic changes at this time. For example, Proposal 61 could delay the opening of the sockeye fishery until June 28, resulting in significant economic harm to fishermen, processors, and local communities.

The current plan already provides tools to conserve Chinook salmon while allowing managers to respond in real time to run timing, abundance, and in-season information. Changing the structure of the plan now would effectively reset the clock, undermine one of the most thorough stakeholder processes the Board has undertaken, and limit the Department's ability to manage adaptively.

I respectfully urge the Board of Fisheries to reject Proposals 44 and 61–68 and allow the existing Nushagak King Salmon Stock of Concern Management Plan to remain unchanged until it can be properly evaluated with sufficient data.

Krystal Foote
Permit Holder: SN 60872
[redacted]

BOF Bristol Bay Finfish – January 2026 Meeting - Public Comments

Support Proposal 45 - *Extend the registration/reregistration deadline in the Naknek-Kvichak District from July 17 to July 22.*

Comment:
As a third-generation permit holder fishing Naknek-Kvichak, I support extending the registration dates because sockeye salmon are consistently peaking later in July, and this adjustment helps ensure better escapement and fair access for all gear types.

Support Proposal 46 - *Amend the Sockeye Salmon Fisheries Management & Allocation Plan in the Naknek-Kvichak District to align allocation dates with the extended season.*

Comment:
I support adjusting the management dates to match later returns, which helps commercial fishers plan and fish sustainably while giving runs a better chance to meet escapement goals.

Support Proposal 48 - *Modify the Kvichak River Sockeye Salmon Special Harvest Area (KRSHA) by adjusting the ratio of drift gillnet to set gillnet openings and reducing the gear removal distance offshore.*

Comment:
I support proposal 48; modern fleets and participation patterns differ from when the old ratios were written. This change recognizes that drift and set gear need more balanced opportunity in the KRSHA so that all commercial fishermen can make a season.

Support Proposal 49 - *Revise the KRSHA management plan to create a dynamic ratio of drift to set fishing periods based on recent permit participation.*

Comment:
I support proposal 49; rather than a rigid 3:1 ratio, a dynamic system that responds to actual participation gives a fair shot to set and drift vessels alike and better reflects how Bristol Bay fishing fleets currently operate.

Support Proposal 50 - *Amend the Bristol Bay commercial salmon management plan to explicitly include fish quality and economic value as objectives alongside escapement and allocation.*

Comment:
I support proposal 50 because the quality of harvested salmon directly affects market demand and price, which is critical to keeping our fishery strong year after year. Including product value and waste

reduction in the management plan helps ensure Bristol Bay salmon stay premium and supports long-term economic sustainability for commercial fishermen.

Oppose Proposal 61 — *Increase Early-Season Restrictions to Protect Nushagak King Salmon*

Comment:
As a third-generation commercial fisherman and permit holder in Bristol Bay, I oppose Proposal 61 because it removes essential in-season management flexibility and imposes rigid closures and sport retention bans that are not supported by clear evidence of conservation benefit, while placing a disproportionate burden on the commercial fleet. The existing management plan already provides tools to protect king salmon, and this proposal unnecessarily sacrifices livelihoods without addressing the full range of factors affecting king returns.

Oppose Proposal 62 — *Delay Commercial Fishing to Protect Early-Run Nushagak King Salmon*

Comment:
I oppose Proposal 62 because a blanket prohibition on all commercial fishing prior to June 28 or until 55,000 kings pass sonar ignores real-time run timing variability and would severely harm permit holders and processors without guaranteeing improved escapement. As a third-generation fisherman, I support conservation, but management should remain responsive and data-driven rather than based on fixed dates and assumptions that oversimplify a complex system.

Oppose Proposal 71 — *Reestablish General District (late season option)*

Comment:
As a third-generation fisherman, I oppose Proposal 71 because reopening a General District late in the season increases the risk of mixed-stock interception and weak-stock impacts without solving the underlying enforcement problem. Boundary violations should be addressed through enforcement and management, not by expanding fishing areas in ways that could harm conservation and long-term sustainability.

Oppose Proposal 72 — *Expand Eastside boundaries into Late Season Harvest Area*

Comment:
I oppose Proposal 72 because expanding district boundaries into the LSHA creates a higher risk of coho, chum, and Chinook bycatch and shifts management risk onto the resource in exchange for short-term operational convenience. As a permit holder, I believe conservation and clear stock separation must come before late-season access.

Oppose Proposal 73 — *Open all gear groups in a General District late season*

Comment:
I oppose Proposal 73 because opening a fleet-wide General District late in the season increases

competition, interception, and conflict without addressing enforcement gaps or conservation concerns. This proposal trades orderly management for short-term access and risks long-term harm to both stocks and fishermen.

Oppose Proposal 74 — *Mandatory General District once escapement goals are met*

Comment:
I oppose Proposal 74 because automatically reverting to a General District removes the department's ability to manage adaptively and protect weaker stocks late in the season. Enforcement challenges should not be solved by weakening stock protections and expanding fishing areas.

Oppose Proposal 75 — *Permit stacking (single owner, two permits, 200 fathoms)*

Comment:
I oppose Proposal 75 because allowing permit stacking concentrates access and wealth into fewer hands and raises barriers for young and new fishermen trying to enter the fishery. The long-term health of Bristol Bay depends on maintaining broad participation, not accelerating consolidation.

Oppose Proposal 76 — *Permit stacking with broad fleet support claim*

Comment:
I oppose Proposal 76 because further consolidation through stacking risks undermining community-based participation and could permanently change the character of the fishery. Economic downturns should be addressed through market and policy solutions, not structural changes that favor capital over people.

Oppose Proposal 77 — *Creation of permanent "E" consolidated permits*

Comment:
I oppose Proposal 77 because creating permanent consolidated "E" permits would lock in consolidation and remove flexibility for future generations, making it harder for local and young fishermen to enter the fishery. Permanent structural changes should not be made in response to temporary economic cycles.

Oppose Proposal 78 — *Permit stacking plus reduced CFEC penalty treatment*

Comment:
I oppose Proposal 78 because it not only promotes consolidation but also weakens accountability by reducing regulatory consequences for stacked permits. Conservation and compliance should be strengthened, not relaxed, especially as pressure on the resource increases.

Support Proposal 81 – *A case study for alternative harvesting methods in Bristol Bay*

Comment:
I support Proposal 81 because it creates a controlled opportunity to evaluate alternative gear that may improve salmon quality, reduce impacts on Chinook and other stocks of concern, and potentially

establish a market premium for Bristol Bay salmon. The temporary, research-oriented nature of this proposal is exactly the kind of adaptive management we need to remain both ecologically responsible and economically viable in a rapidly changing seafood industry.

PC75

Submitted by: Avi Friedman
Ekuk Beach Fisherman's Association
Community of Residence: Baltimore, Maryland

Avi J. Friedman writing, I'm a set-net fisherman on Ekuk Beach in the Nushagak District of Bristol Bay since 1986 (39 seasons so far, with only one way to quit). I am a member of the Ekuk Beach Fishermen's Association. Since the 1990's I have been bringing salmon home to Baltimore to sell myself. I have 800+ devoted customers who realize that the salmon they buy from me is the best they can get. Don't ever think that non-residents can't or don't support Alaska - I know of over 20 families (customers) who have traveled to Alaska (and spent money in Alaska) because they wanted to learn more about where their salmon comes from.

I worked for ADF+G for the better part of 7 years before starting commercial fishing.

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. This is common sense to me - a decision was made to change Chinook management experimentally in an effort to increase Chinook escapement. It makes no sense to trash a reasonable program before its time is up. That would be a waste. We're talking about the 7-year Chinook life cycle.

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Permanence will add stability to the rules government commercial fishing in Bristol Bay.

I also support Proposal 57: Orderly and Safe Fishing. I have no issue with Drift Fishing whatsoever. But the FACT is that every year, a certain few drift fishermen drive their boats at absolute top speed directly over our set net gear, and cause damage such as broken ground lines, which causes lost fishing time. This is simply extremely rude behavior and should be outlawed. There is no need whatsoever for a drift boat to run at top speed directly over a set net site's gear. The drifter's say "we run over our own line all the time and we never have an issue." Of course - because they're running over their own gear at idle speed. When they run over set net gear they are running at absolute top speed, and they break our ground lines because there is no time for our ground lines to adapt to the increased pressure. This is extremely rude behavior and needs to be made illegal right now. Gear destruction of another fisherman is, or should be, made illegal. Drift boats have the entire Bay to travel wherever they want - there is no reason for them to drive over set net gear. I cannot argue this strongly enough.

I also support Proposal 80: Joint-Venture Set Net Operations. This seems reasonable to me, in an effort to help set net families become more coordinated in their operations.

Re Economic and Community Impacts of Missed Allocation - I feel very strongly about this, that our Board-adopted 26% set-net allocation be adhered to. What is the purpose of a law that is not adhered to by the very Agency that made the law? This does not at all instill faith in our salmon management system! This directly hurts the Nushagak Bay/Ekuk Beach set net fishermen and their families, due to lost fishing time and obviously lost income.

Together these requests are steps toward more equitable harvest share in practice, not just theoretically on paper. Allowing the Chinook Management Plan to complete at least one full life cycle of Chinook salmon before considering alterations and changes to the Plan will encourage participation and trust in future conservation management.

Proposals 56 and 57 will reduce conflict and safety risks that disproportionately affect on-shore set net fishermen, due to the VERY RUDE BEHAVIOR of a small group of drift boat fishermen. I emphasize that I have nothing at all against drift fishing, there is plenty of room for everyone. It's just a few that cause a lot of damage to set net gear as a result of their very rude behavior which needs to be made illegal.

Proposal 80 will provide some limited flexibility for small set net operations to become more efficient.

I wish to thank the Board and all who read this for the opportunity to express my thoughts on these very important issues which will greatly affect Ekuk Beach set net fishermen. Thanks for the opportunity to contribute.

Avi J. Friedman

Ekuk Beach, Nushagak District

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is **Celia Friedman**, and I am a family member 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.

I have been fishing with my mom and dad since I was 10 months old. I spent my summers growing up on Ekuk Beach, I love it and I want to see our lifestyle protected for generations to come.

I want to strongly express my support for Proposals 56 and 57. Every season we see boats running over our gear. Every season we see gear broken from boats. It doesn't matter the type of boat, prop or jet, our gear is under so much tension that boats coming into contact with it risks it breaking. When our gear breaks we miss out on anywhere from a day to multiple weeks of fishing depending on where the site is located/how low the tide gets and when. These proposals are important to protect set-net gear and the limited amount of time we have to fish during the season.

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,
Celia Friedman
Ekuk Beach, Nushagak District

PC77

Submitted by: Luke Gardner
Community of Residence: Naselle Wa

Prop 45) this is a really good idea, drop card do a shakedown day or so, unregister, address unforeseen issues on a 48h off and start season on a fresh slate… genius, why not? Sure beats transferring three times while at port fixing shakedown discoveries.

Prop) 52 I'm obviously in support of this, as I wrote it. Please correct h)1)C) to read "No part of a set gillnet may be set or operated more than 500' seaward of the 18' high water mark."

Prop 61,62,63) All the same comment;

I am against these proposals. The table cited at the end of proposal 62 shows the historical vested interest in the allowable harvest of kingsalmon in the Nush. The table is broke into five distinct harvester categories. Phylisophically I disagree with how these categories are divided, but I'll save that for later. The categories as listed are commercial, sport above sonar, sport below sonar, subsistence below sonar and sub above sonar. I find it interesting that while the commercial harvest has plummeted in recent years (by percentage of historical average) found at the bottom of the table, sport harvest has continued to rise in recent times (by percentage of historical average). The historical average listed there is 58,515 King commercial harvest, and 4,031 King sport harvest. This is a historically accurate record of these harvesters vested interest in King harvest. Just the facts. In 2022, per that chart, commercial harvest was 5,431 Kings, which is less than 1/10th of the 58,515 fish historical average that represents the commercial harvesters vested interest. That's a reduction of 90%ish

Whereas, per that chart the sport harvest in 2022 was 5,298 kings which is 31% higher than the 4,031 fish historical average. So in 2022 while one harvest group has harvested only 10ish % of its historically vested harvest, the other harvester group has harvested at a rate of 130ish% of its historically vested harvest.

While I recognize a dead fish is a dead fish regardless of its harvesters identity, and I recognize that it is a fact that in 2022 the commercial harvester was indeed 133 fish more than the sport harvest, I also recognize that pointing out that the commercial harvest was larger than the sport harvest in 2022 entirely ignores a handfull of important details.

One of which is, vested interest as a percentage of the allowable harvest total.

Speaking in terms of harvest percentages of allowable harvest and vested interest that establish those percentages is quite familiar and some may say 'customary' in Bristol Bay. Allocation is the term we use to encompass the concept. These proposals ignore the fact that this very chart cited in one of them clearly shows that 4/5 of the historical vested interest in the total allowable harvest has been vested by the commercial harvesters. 14% was harvested by subsistence, and shy of 6% was harvested by sport harvest. These are just the facts, of what has happened in black and white, on paper, historical data sets found in the chart cited. These proposals do not represent the vested harvester groups in an historically equitable manner. And therefore the board should not approve these proposals, for that reason alone.

Beyond that I find it quite interesting that the constant (or near to) is the subsistence harvest. Calculated from that chart, 2022 sub harvest was 97% of its historical average. And the 2012-2021 average sub harvest was 115% of the subsistence's historical average… pretty stable and consistent considering all worldly factors of change since 1966.

This is where I think it's important to re-evaluate everything to its core and return this conversation to something I mentioned in the beginning of this comment. Harvester group identity. As previously identified the chart cited (for the above figures) has five identities of harvesters listed. Let's for simplicity of discussion narrow that to 3 listed groups, commercial, sport and subsistence or 'sub' for efficiency. These 'identities' are misleading and need re-evaluated if the totality of this king shortage is going to be equitably rationalized in a time and tradition honored moral manner. It's my view that the sub harvest is sacred and should be the very last straw drawn regarding conservation restrictions. Whereas commercial is at the other end of the spectrum to sub harvest. Those two identities fit their 'identity' while one is purely operating in commerce, the other is void of that aspect of commerce. It's no accident that commercial fishing got its name from the simple fact that it specifically implies - operating in commerce.

Here is where the re-evaluating needs to begin, sport fishing harvest needs to be bifurcated. One part of it is private regarding an individual using his equipment angling for food, with no exchange of money for guide or transport or service provider. This angler is not operating in commerce. He/she is fishing for dinner and/or recreation. Then there is the guided, supplied, transported, angler contracting with providers to facilitate the harvest of fish. Contracting in this manner is operating in commerce. Until this is addressed, resolve to this king matter will be daunting.

The private sports angler is or is very much akin to the subsistence fisher, whereas the contracting guided angler and their guides are operating in commerce and are akin to commercial harvesters.

Commercial harvesters have had zero intentional harvest of Nush kings for over a decade, it's time commercial/sport category share that responsibility in an equitable manner. Mortality while targeting other species for both those groups should be the focus and it should be divided in a time honored vested manner

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PC78

Submitted by: Aristotelis Georgakopoulos
Community of Residence: Seattle

I oppose prop 44 and 61-69. These new regulations will drastically alter the ability for tim sands to meet the escapement goals for the nushugak district. This will wildly over escape the watershed and will cause irreparable damage to the mighty nushugak sockeye run. Not only will the fishing fleet suffer, the amount of tax revenue for the borough will drop dramatically. These propositions hurt the bay as a whole. Lets all stand together and aim for a maximum sustainable harvest of our beautiful and precious resources, for generations to come.

Submitted by Darin Gilman
Cordova, Alaska

Proposal 44- Oppose

Proposal 61- Oppose

Proposal 62- Oppose

Proposal 63- Oppose

Proposal 64- Oppose

Proposal 65- Oppose

Proposal 66 -Support

Proposal 67- Support

Proposal 68- Oppose, the sustainable escapement goal does account for fish size and fecundity. Instead of creating an OEG for King Salmon, ADFG should be allocated the resources to have stream surveys post sonar to correlate the data. By allowing ADFG additional resources it would create a complete picture of the King Salmon run, versus comparing recent commercial catch data being compared to historical commercial catch data. This is like comparing apples and oranges with all the restrictions that have been implemented on the commercial fleet. Sonar counting variability due to large sockeye runs is a challenging issue, but ADFG has historically erred on the side of cautious management when there is missing information.

PC80

Submitted by: Thomas Glass
Community of Residence: Dillingham, AK

Proposal 57

I strongly disagree with this proposal.

I am writing to express concern regarding the proposed new regulations for the Ekuk and Bluffs area. While I understand the need to prevent gear conflicts, I believe the proposal may be unnecessarily restrictive for the majority of responsible drift net fishermen.

Currently, regulations effectively separate set net and drift net gear. The existing rules, combined with practical self-interest, already create a strong incentive for drift fishermen to avoid set net areas. Entangling gear results in significant damage, loss of valuable fishing time, and risk of beaching. Most occasional entanglements are due to severe weather or, in rare cases, by individuals who knowingly disregard the rules—individuals who are unlikely to be deterred by new regulations.

It seems unfair to penalize the entire drift fleet by eliminating an established and historically productive drift. I learned the "Bluff drift" as a deckhand out of Dillingham in 1989, and it remains a major part of my summer fishing activities. In my long experience, and I believe that of most drift fishermen, this drift can be and is executed routinely without interaction with set nets.

Furthermore, the current system allows for flexible use of the area. There are many times when set net fishermen are not actively fishing. Under existing rules, drift nets may be legally deployed there, provided all distance requirements from any in-water gear are maintained. This existing flexibility is a reasonable balance that the new proposal would eliminate.

For these reasons, I disagree with the proposal. Thank you for the opportunity to comment.

Boards Support note: this comment submission was received as comments in the full proposal book and the proposal text was removed to focus on the substantive comments.

Submitted by: Kyle Gleason
The United States of America

PROPOSAL 45

I believe Biologists should have the right to extend the free transfer date, but it should not be forcibly extended to the 22nd.

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PROPOSAL 46

Same as my response to proposal #45.

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PROPOSAL 47

Same as my response to proposal #45.

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PROPOSAL 48

The idea that drift and set openers are to be managed by a ration is a difficult ask for the managing biologist. I'm not in support of this.

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PROPOSAL 49

Same response as proposal #48.

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PROPOSAL 50

I agree with the intent of this poorly worded proposal.

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PROPOSAL 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.

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PROPOSAL 52

I support this proposal. It 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.

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PROPOSAL 53

This misses the mark that is more accurately addressed in the open district proposals later on. I am against this.

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PROPOSAL 54

I support this proposal.

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** PROPOSAL 55

If I'm reading this correctly, it is the same intent as proposal #54.

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** PROPOSAL 56

With sea level 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.

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** PROPOSAL 57

I do not support this. This esstually makes a setnet exclusive area reguardless 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.

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PROPOSAL 58

I'm not sure I understand this proposal's impact.

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** PROPOSAL 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.

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** PROPOSAL 60

Neutral on this one.

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PROPOSAL 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. Nor should non biologists be making regulatory decisions that may affect the future of the King Salmon.

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** PROPOSAL 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. Once again, let the biologists do their job.

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** PROPOSAL 63

This is a step in the right direction. More accurate data is needed to properly manage kings in this system. If our biologists support this I support this proposal.

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** PROPOSAL 64

I agree with the logic of this proposal.

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** PROPOSAL 65

1st, king salmon counting needs to more accurate. 2nd, Ekuk setnetters use trucks to drag their nets onto the beach. When the Wood river opens, Ekuk setnetters are not equipped to fish that area. I understand that this puts them at a disadvantage, but I don't think we should be catering to this group. I oppose this proposal.

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PROPOSAL 67

Again, we need accurate counting first. I oppose.

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** PROPOSAL 68

Accurate counting first. I oppose.

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** PROPOSAL 69

Without accurate counting, we cannot make rules like this. I oppose. We need our biologists to lead here.

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PROPOSAL 70

The Ugashik folks suffer. I think they should be moved further west on that boundary.

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** PROPOSAL 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.

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** PROPOSAL 72

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

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** PROPOSAL 73

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

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** PROPOSAL 74

I support this proposal.

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PROPOSAL 75

Permit stacking has many benefits. I strongly support this.

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** PROPOSAL 76

I support this proposal.

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PROPOSAL 77

I don't see this as necessary if permit stacking is allowed.

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** PROPOSAL 78

Long winded pitch for permit stacking.

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** PROPOSAL 79

No opinion on this gear type in this area.

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** PROPOSAL 80
5 AAC 06.331. Gillnet specifications and operations.

This is a departure from the intent of owner-operator, essentially allowing a setnet permit owner to lease their permit to another and not be present. I do not support this proposal.

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** PROPOSAL 81

Beach seins? I'd like to know more.

PROPOSAL 82

The 32' limit restriction is antiquated and questionable in its original intent. I would like to see the length limit removed. While this has good intent, it's not addressing the root issue.

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** PROPOSAL 83

I support this.

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PROPOSAL 84

Proposal 83 is better.

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** PROPOSAL 85

Remove the limit.

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PROPOSAL 86

Remove the limit.

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** PROPOSAL 87

Remove the limit, not just the rule that affects your boat.

PC82

Submitted by: Michael Hafer
Community of Residence: Snohomish, WA

I support proposal 102 as it encourages conservation of native fish and preserves their vital return within the ecosystem. It responsibly allows for the targeting of sockeye salmon by the sport fisherman and protects the fragile king salmon population. Further it incentivizes me to travel to Alaska and spend my recreational time and dollars with local communities outside of mainstream tourism.

I respectfully request the board to enact proposal 102. Thank you.

PC83

Submitted by: Christopher Hager
Bristol Maps
Community of Residence: Bothell, Wa

I am writing to strongly oppose proposals 44 and 61-68. These proposals all serve to remove control and power from the local biologists and community members that have done an exceedingly great job of managing a fishery under difficult circumstances. I fully appreciate that King Salmon need to be preserved and the existing BOF plans are already working towards that goal. Further removing the power from the Biologists will only further politicize the issue and remove science and control from the experts on the issue.

Prop 82-84: I am also writing to strongly support Drift vessel length modifications. The 32ft limit has been proven to be ineffective of creating an equitable fishery for all members. New vessels are over twice the displacement of average vessels when this regulation was last modified. It is now only a limit on safety and efficiency. Larger vessels would provide a safer and more efficient platform. Less fuel is burned on longer vessels and they would also provide a better platform for direct marketing a vessels catch directly to consumers.

PC84

Submitted by: Alan Hed
Togiak River lodge
Community of Residence: Oregon

I have fished the togiak river for over 15 years. I fished this when the king salmon run was extraordinary. I watched the run decline year after year and support, under current conditions, the no bait (particularly “eggs” before July 11 (agree with togiak river lodge to move this up to 11th as they use shrimp to target sockeye.

The new owners of togiak river lodge have taken extra steps to protect for future generations. Even though “eggs” were allowed last year, the lodge has implemented a policy to not use eggs. They have also shifted there business model to “spade” fishing with 90% catch and release during the peak season (June -July 1)

The request to move “bait allowed” up by 5 days is not to target kings but sockeye .

I also agree with the shift of the deadline proposed by togiak river lodge as they do not fish above these restricted areas and respect the spawning areas by salmon moving up river.

The new owners are guardians for the salmon and they would not recommend a change if it effected negatively the future of the salmon on the river . They are going owners and know their future livelihoods depend on a healthy return year after year.

If the rules proposed by togiak help their business by helping sockeye retention and protects the king salmon run the Alaska Department of Fish and Game should deploy support this change as the success of togiak river lodge has and will continue to have a significant positive impact on the health of our salmon.

Alan Hed

PC85

Submitted by: Dave Hendrie
Community of Residence: Oregon

I strongly support proposition 102. The majority of salmon spawning occurs above the Pongo River. By moving the line to the Pongo, Law enforcement will more easily be able to enforce the line. No lodges operate above the confluence making this location an ideal cutoff,

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PC86

Submitted by: Adam Hess
Community of Residence: Meridian Idaho

I am writing to express my support for the Togiak River Lodge, a place we deeply cherish and value. The owners, Jordan and Zach Larsen, have demonstrated exceptional stewardship of the land and fisheries in this region. Their commitment to the health of the fish populations and the long-term sustainability of the fishery is evident in the way they operate and care for this resource.

With this in mind, I respectfully ask that you consider the proposed regulation changes:

(1) to allow the use of bait on the Togiak River beginning July 11, rather than July 16, in order to responsibly target sockeye salmon a few days earlier; and

(2) to adjust the upper boundary for targeting king salmon from the Geciak River to the Pongo River.

These changes would support responsible access to the fishery while maintaining the focus on conservation that the Larsen family and many of us who enjoy the Togiak work hard to uphold.

Thank you for your consideration.

PC87

Submitted by: Walt Hess
Community of Residence: Twin Falls Idaho

I am writing to voice my appreciation for the Togiak River Lodge, a place that holds great meaning for many of us. Its owners, Jordan and Zach Larsen, have consistently shown a deep respect for the land and

the fisheries, managing both with a strong focus on conservation and long-term sustainability. Their actions reflect a genuine commitment to protecting the fishery for future generations.

In light of their responsible stewardship, I ask that you give thoughtful consideration to the proposed regulation updates. Specifically, I support opening the use of bait on the Togiak River on July 11, five days earlier than the current date, to allow anglers to access the sockeye run in a timely yet sustainable manner. I also support shifting the upper boundary for king salmon harvest from the Geciak River to the Pongo River, which would better align with how the fishery is used and managed.

These adjustments would enhance angler opportunity while remaining consistent with conservation goals that both the lodge and its supporters strongly value.

Thank you for taking these recommendations into account.

PC88

Submitted by: Tara Hines

FV Attie Mae - Bristol Bay Drift Gillnet Vessel and Permit Holder

Community of Residence: Montana

Dear Members of the Alaska Board of Fisheries,

My name is Tara Hines, I am an owner of a Bristol Bay drift permit and captain of a drift gill net vessel FV Attie Mae. As a third generation commercial fisherman I understand the importance of protecting Alaska's valuable salmon resources and fisherman's way of life. 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.

Further restricting sockeye salmon harvest could have negative long term effects on sockeye returns without any proof of increased returns for Chinook salmon.

Available analyses indicate the current 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,

Tara Hines

Captain FV Attie Mae, Bristol Bay Drift Gillnet

Dear Members of the Alaska Board of Fisheries,

My name is Ross Hofacre; submitting this written testimony in opposition of Proposals 44, and 61 through 68.

I am a full time resident of Petersburg, Alaska with interest in the listed proposals as a drift gill net fisherman, S03T permit holder, and owner operator of fishing vessel Jollene K in Bristol Bay.

The main reason I oppose Proposals 44 and 61-68 is because they would modify the current King Salmon Stock of Concern Management Plan in the Nushugak District.

The SOC management plan was developed over 5 years, driven by stakeholders and Advisory Committees from the commercial, sport, and subsistence sectors, as well as representatives from the Alaska Department of Fish and Game. Ultimately it was adopted in March of 2023 and has only been in place for the past 3 fishing seasons.

Data shows the plan has been implemented as intended by reducing exploitation of king salmon in the commercial fishery, increasing escapement prior to harvest exposure, delaying commercial openings, and reducing fishing time during peak Chinook vulnerability. However Chinook salmon typically have a 4-7 year life cycle therefore the plan was not expected to display immediate recovery of Chinook stocks and the plan still needs time to produce results. If work on a 4 year system ends after 3 years is anything truly learned?

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

Sincerely,
Ross Hofacre
F/V Jollene K

PC90

Submitted by: David Hollingsworth
Community of Residence: Aberdeen wa

I oppose proposals 44 and 61-69 we need to keep the current plan going forward

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PC91

Submitted by: Eugene Horvath
N/A
Community of Residence: Oregon

I have reviewed the submission for the new rule changes on the Togiak River. As an avid fisherman, who has spent the last 10 years on the Togiak River fishing for both Kings and Silvers and all the Pacific Species, I highly recommend this change. The active guide services on the Togiak honor and follow all the rules to preserve this fishery. I have spent 10 years observing it with multiple different services. Togiak River Lodge, is by far the most conservative and honorable in protecting this fishery. Sports fishing on the river is a blessing and true outdoorsmen's treasure. The changes to Kings and bait fishing for Sockeye is a real need. Commercial fishing is the issue, not the sports fishing participants.

PC92

Submitted by: Calum Houston
Community of Residence: N/A

Dear Members of the Alaska Board of Fisheries,

My name is Calum, 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,

Calum Houston

PC93

Submitted by: Robert Huff
JorDanielle inc
Community of Residence: Salish Sea/Washington, whatcon county

Proposal 44 and 61-69 , are skewed towards the sports fishing lodges. We have not even had enough time to see if the last regs have done their work. Also I beleive bycatch from the factory trawlers are the true cause of declines and stopage/much better monitoring of the large trawler fleet is the true answer to this dilemma. Taking this out on 32' drfters and set netters is not a proper solution

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PC94

Submitted by: Megan Hurlburt
Ekuk Beach Fishermans Association
Community of Residence: Dillingham, AK

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Megan Hurlburt, and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District and a member of Ekuk Beach Fishermans Association. I grew up fishing Ekuk beach surrounded by three generations of family that worked this industry before me. My great grandfather fished the site next to me until he was 99 years old and now my children and my nephew are coming up behind me surrounded by their grandparents, aunts, uncles and cousins. This fishery is certainly an economic benefit to my family and as a mom it allows me to bring in a second income that has become so neccesary for families these days while keeping my work schedule as a dietitian very flexible during the school year so I can be involved in my children's education and upbringing without relying on childcare. But even more than that, it feels like coming home to so many people in my family as we gather together every year to continue the tradition. I say all that to say thank you for your service on this board and careful consideration of these proposals because they absolutely make a very real difference in people's lives.

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.

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, gearloss, 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. I have seen so many dangerous incidents and close calls when drift boats/ gear have made contact with set net gear. For example, in 2024, a high powered jet boat ran over my sister's upper end line (connecting the net to the beach anchor) while we were pulling the net with our truck. During this procedure the line is under a deadly amount of tension. Fortunately we saw

the boat coming and my crew were able to get out of the way narrowly escaping being severely injured when the rope snapped. Another boat saw our line snap and towed our net back to us before it was lost which was also a very dangerous process due to the extremely swift tidal current on the beach but we were thankful for their help. Some boat captains will try to tell you that this type of "impact set" is and important part of their fishing strategy but the truth is the majority of the drift fleet in the Nushagak is opposed to this type of set as it is dangerous to both the boat crew and to set net crews and very often results in fish waste as their nets roll in the surf and they can't recover their catch so even among the drift fleet this is recognized as irresponsible fishing. The boats that are making these types of sets are usually driving dangerously everywhere in the district and not making friends amongst the drift fleet either.

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.

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,

Megan Hurlburt

Ekuk Beach, Nushagak District

PC95

Submitted by: Jimmy Hutchens
Community of Residence: Mount Vernon, Washington

I am a drift gillnet permit holder in the Bristol Bay fishery and I am concerned that several of the proposals that are being considered at the Board of Fish meeting coming up in the near future will adversely affect the ability of the gillnet fleet to be prosecuted effectively. Proposals 61,62,63,64,65,66,67 and 68 will substantially change the Nushagak King Salmon Recovery Plan that was instituted in March of 23. This plan adequately addresses the the recovery of the stock of concern and uses a balanced approach for sockeye and king salmon escapement. This plan should be given a chance to show results since it hasn't even been in place long enough to document one life cycle of the king salmon stock.

I oppose all of the above proposals and would urge the board to not adopt them.

Thank you for your consideration,

Jim Hutchens

PC96

Submitted by: Dale Hutchins
Togiac River Lodge
Community of Residence: Grass Valley CA

In regard to the proposal submitted by Jordan and Zach Larsen of the Togiak River Lodge, I would like to say that as a guide at that lodge, they are conservation minded people and only wish to see a healthy eco system and a healthy fishery for that river system! They have fired guides that have shown disrespect for that river system. I believe that what they are proposing is reasonable and I know that if approved, they will abide by the decisions made by State and local fishery authorities.

Respectfully Submitted;

Dale Hutchins, Fishing Guide

Dear Madam Chair & Members of the Board –

I am a year-round resident in Dillingham. My husband and I own and operate a commercial drift vessel, the F/V Kokua in the Nushagak District for sockeye salmon and are a multigenerational commercial fishing family.

We rely on subsistence salmon to feed our family year-round and are recreational sport fishermen in the Nushagak and Wood Tikchik drainages.

Please see below my comments on select 2026 Bristol Bay Finfish Proposals.

Proposal 44 – Oppose the current reporting requirements in regulation are sufficient and subsistence is the priority user in the State of Alaska.

Proposal 55 – Support Repeal the Nushagak River Coho Salmon Management Plan while still ensuring opportunity for Coho harvest is permissible.

Proposal 57 – Support As Amended by the Nushagak AC – Oppose as written in Proposal book

I support the Proposal as Amended by the Nushagak Advisory Committee, aiding in the solution of what is truly an enforcement and safety issue without restricting access to established drift fisherman areas. The proposal as amended would simply instate new regulatory language as follows and disregards the remainder of the proposal:

5 AAC 06.331. *Gillnet specifications and operations. Prohibit drift gillnet gear from coming into contact with set gillnet gear in the Nushagak District, as follows:*

(w) In the Nushagak District, no part of a drift vessel, gillnet, line, buoy, or other device used to drift a gillnet may be operated so as to come into contact with a set gillnet, line, anchor, peg, stake, buoy, or other device used to operate the setnet.

Proposals 61-69 – Opposed

I am opposed to any changes in the existing Nushagak King Salmon Stock of Concern Management Plan.

This plan was made in collaboration with a diverse user group, carefully vetted and implemented. In its three years of being in regulation the plan has had the intended conservation measures. It is too new in its inception, not even a full lifecycle of a King salmon, to truly know the long-term benefits. We are advocating leaving the plan unchanged for at least another Board cycle, noting subsistence users have reported more Kings available for harvest, the commercial fleet has been standing down for the early season and for windows throughout the run, and sport users' retention and opportunity has been restricted.

If the plan is opened and regulatory changes are made, we are advocating the conservation effort is shared among commercial and sport users with subsistence retaining priority. Proposal 67 in which I am a co-author of and Proposal 66 from Travis Wren would be avenues of discussion for Sport user

concessions, with the commercial users potentially utilizing the WRSHA or adjusted SEG/OEG's as concessions.

Again, the best possible outcome would be to make no changes to the stock of concern plan for this Board cycle and allow more time for true representation of benefits to come to fruition.

Proposals 71-74 & 81 Oppose – I am in opposition to any General District, the introduction of new gear types, or the allowance of fishing outside of the established commercial districts.

Proposals 75-78 Oppose – Permit stacking leads to consolidation of the fleet and is disadvantageous for the local watershed and residents of Bristol Bay. The dual system we have in current regulations is beneficial to residents and non-residents alike and creates opportunity in the fishery.

Proposals 82-91 Oppose – I do not believe any additional regulations or regulation changes are needed regarding vessel specifications. What is needed is clear communication with Law Enforcement prior to the season and an understanding fleet wide of definitions. BBEDC's approach to solving this issue is reasonable and clear; we support their efforts without making regulatory changes. I am opposed to increasing the 32' vessel limit in Bristol Bay, regardless of reported rationale.

For all other proposals not referenced here please defer to the Nushagak AC comments and actions as representation of the Nushagak area.

Quyana,

Susie Jenkins-Brito

Dillingham, AK

Opposition to Proposals 44, 61, 62, 65 and 68

Dear Board of Fisheries Members,

Writing as a Dillingham resident, Bristol Bay drift fisherman and former Board of Fisheries member, I'm familiar with the years of work that went into crafting the Nushagak King Salmon Stock of Concern Management Plan. Proposals 44, 61, 62, 65 and 68 all seek to make changes to that management plan, which is ill-timed and ill-advised advised. I respectfully urge the board to reject them all.

Work to rebuild Nushagak king stocks began in February of 2018. Initially three Board of Fish members were part of the study group, populated also by four representatives of the sport fishing industry, three commercial fishers, a subsistence representative and three veteran fisheries scientists. (See summary RC46 below, excerpt from https://www.bbsri.org/_files/ugd/bc10d6_759a9fa3abec4ee9810f9c3facf6ee6d.pdf

As Board members, you know how finding agreement among different gear groups can be time consuming and often impossible. The SOC study group agreed from the start to operate on consensus, and took four years to complete its work.

The resulting SOC management plan was approved unanimously by the Board of Fish in March of 2023, and has been on the books for less time than even the youngest chinook salmon could mature and return to spawn. For a species with a life cycle of four to seven years, proposing to change the management plan now is either naive, as in Prop 44, or motivated by allocative reasons as in Proposals 61, 62, 65 and 68.

A reasonable expectation of harvest opportunity for all users was an expectation included in the Board's creation of the Nushagak SOC study group. There was never an expectation that king stocks would recover in one three year board cycle. Reopening debate on the SOC plan suggests that the management plan has failed before it's even begun

I urge the Board to oppose proposals 44, 61, 62, 65 and 68, and any others that would aim to scuttle a carefully crafted and critically important management plan before it's had time to take effect. Changing the structure of the plan would reset that clock, and discredit one of the most thorough stakeholder processed the Board has ever directed. The Nushagak SOC Management plan needs to be evaluated over a full life cycle of chinook salmon.

Thanks for your attention to this, sincerely,

Fritz Johnson
F/V Jazz
Dillingham

Excerpt from report submitted in November 2022, to provide Board with the names of the Nushagak King Salmon Committee members, submitted as an RC in March 2023

Summary of Outcomes from the Committee to Examine the Nushagak-Mulchatna King Salmon Management Plan, 2019-2022

Prepared by:

Tom Brookover, Jeff Regnart, and Michael Link

Bristol Bay Science and Research Institute
Box 1464, Dillingham, Alaska 99576

Prepared for:

Nushagak-Mulchatna King Salmon Management Plan Committee
and
Alaska Board of Fisheries

Final DRAFT, Submitted to Alaska Board of Fisheries, Public Comment

November 14, 2022

Executive Summary

This report is one of four reports prepared by the Study Team that worked with the Alaska Board of Fisheries committee to examine options to revise the Nushagak-Mulchatna King Salmon Management Plan (NMKSMP). This report documents the process and outcomes from that committee, which met between February 2019 and April 2022.[1]

During the December 2018 Bristol Bay Finfish meeting, the Board of Fisheries (Board) struck a committee to review Nushagak River and District fisheries and regulations, and to provide recommendations on a comprehensive solution to Chinook salmon management. Three Board members were assigned to the committee (Payton, Morisky, and Ruffner) and the selection of stakeholders to serve on the committee was to be done in early 2019. In February 2019 at the Special Committee Meeting immediately following the Alaska Peninsula/Aleutian Island/Chignik Finfish meeting the Board selected 8 Committee members representing the commercial, sport, and subsistence fisheries. The inaugural committee meeting took place on October 2019 and a total of 15 committee meetings occurred between December 2019 and March 2022. A final committee meeting was to be held in November 2022 to review this report and prepare for the upcoming Board of Fisheries meeting.

As a starting point for discussions during the first year of committee meetings, members identified the current challenges to, or problems with, management of Nushagak River king salmon fisheries. The focus was on challenges or problems related directly to the NMKSMP, but the discussion was not limited to challenges pertaining narrowly or only to the Plan. After discussing the fishery challenges faced by the Nushagak River king salmon fisheries at the initial meetings, committee members were asked to discuss what constitutes success in their various fisheries? Members were then asked to identify possible management objectives that, if implemented, would ideally fulfill the measures of success as identified. Finally, the groups were asked to identify possible changes or additions to the NMKSMP "action" provisions that direct ADF&G to act and that would, in turn, lead to achieving the objectives previously developed in this process.

In January 2021, the full committee reviewed and revised the lists and descriptions of the Measures of Success, Management Objectives, and Possible Management Plan Actions that had been developed. Shortly thereafter, work focused directly on clarifying possible regulatory management actions needed to achieve the management objectives, and further discuss non-regulatory actions needed. BBSRI provided technical information on certain topics, particularly management triggers and the effects of mesh size on sockeye exploitation rates, to inform and address questions raised by the committee. By April 7, 2022, the committee had reached consensus on seven proposed actions. The committee examined five other actions in detail but failed to reach consensus on them. On behalf of the Committee, the Study Team submitted a

[1] The four reports prepared by the study team include: 1) Historical review of Nushagak River King Salmon Management, 2) this report, 3) Technical analysis of options considered by the Nushagak King Salmon committee, and 4) Recommendations for non-regulatory actions for Nushagak King salmon management.

and Research Institute (BBSRI) committed to supporting the committee's work through a stakeholder-led technical analysis of options the committee was expected to consider (RC 80).

Committee Process

Committee Formation

The board released a request for committee nominations on January 31, 2019 (https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/nm_committee_nominations_request.pdf). The intent of the solicitation was to have interested parties apply by sending in a letter of interest which included their background in the fishery. The applicants' letters of interest were due to the executive director of boards by February 18, 2019.

The Board received 14 letters of interest from which they chose 8 public committee members to represent the stakeholder groups involved with the Nushagak-Mulchatna King Salmon fishery.

Committee Members

Robert Heyano – Lifelong resident of the Nushagak Bay area. He started fishing in the Nushagak Bay on the family-owned set net site in the 1960s. In 1972 he started drift gillnetting as an owner operator which he still currently doing. He has been active in the Board process since 1978 and served on the Board from 2004 to 2007. He has also served on the Nushagak AC and as its chair. He was on the AC when the original NKMP was drafted in 1991.

Bud Hodson – He has been fishing King Salmon on the Nushagak River for 40+ years with 2 different camps for guided angling for Kings. He served on the Board of Fisheries from 1986 through 1990 and served as Chairman of the Board for over 2 years. He was deeply involved with the original drafting of the NKMP and the allocation considerations in the creation of the original Plan.

Brian Kraft - He was the author of Prop 41 and 42 that were before the BOF in Dillingham at the 2018 meeting. Those proposals were the catalyst for the Board to create this committee. He has owned and operated a fishing lodge in BB for more than 25 years. He has operated a fishing camp on the Nushagak for similar time.

Bob Klontz – He has been involved in the Nushagak King salmon sport fishery since 1984 and a property owner on the river since 1999. His families on-river experience of more than 30 years and networking with other camps and fisherman has given him a well-rounded perspective of the status of the inriver fishery and of the King Salmon stock.

Tom O'Connor – He is a year-round resident within the Nushagak Bay area. He has many decades of experience as a set net fisherman in the Nushagak district on Ekuk beach. He is a

long-time member of the Nushagak AC and has participated in the Board process for more than 20 years.

Nanci Lyons - She has been guiding in the Bristol Bay region since 1985 and has been a user of the Nushagak river since 1986. She was involved in the Board of Fish meetings that constructed and approved the original Nushagak King Salmon management Plan and has been actively involved in the fishery and the management Plan ever since. She is the owner/operator of a sportfishing lodge in the BB area.

Peter Christopher – He is resident of New Stuyahok which is a community on the Nushagak River. He has served on the Nushagak AC for many decades. He has subsistence fished for his entire life and commercially fished in the Nushagak district from 1965 to the present. He is an active subsistence fisher for King, Chum, and Sockeye salmon. He and his family are heavily dependent on the salmon they catch for their winter food.

George Wilson - He resides in Naknek across the Bay from the Nushagak. He has commercially fished since 1980 when he was 9 years old with his dad. He currently owns and operates his vessel and permit and has done so since 1999. His children are his crew and will be taking over the family business in due time. He also participates subsistence fishing.

Study Team Members

A three-person Study Team sponsored by BBSRI led and facilitated the committee process, prepared project analyses, and project reports.

Tom Brookover – Tom worked in various capacities with ADF&G since 1985, including as the Commercial Fisheries Assistant and Area Management Biologist for the Nushagak District from 1990-1998. He also worked as the Sport Fish Area Biologist in Sitka, Southeast Alaska Management Supervisor, Statewide Habitat Research Supervisor, and Deputy Director. Tom served as Director of Sport Fisheries Division from 2015 – 2018. Tom joined BBSRI's Nushagak Study Team shortly after retiring from ADF&G in 2018.

Michael Link – Michael has been the Executive Director of the Bristol Bay Science and Research Institute (BBSRI) since 2002. He first worked in Bristol Bay as the Research Project Leader for ADF&G's Commercial Fisheries Division in the late 1990s. Michael has led numerous research projects and policy analyses including an extensive multidisciplinary analysis of escapement goal policies for Bristol Bay sockeye salmon (2012-2015, https://www.bbsri.org/escapement-goal-analysis). Farther back, he led an analysis to examine options to restructure the Bristol Bay commercial salmon fishery (2001-2003, https://www.bbsri.org/other-project-reports).

Jeff Regnart – Jeff has held several positions within Bristol Bay. Starting in 1990 he was the commercial fishery manager for the Naknek-Kvichak district. He then moved into a variety of Bristol Bay regional positions each with a greater scope of responsibility. From 2011 to 2015, Jeff served as Director of the Commercial Fishery Division of ADF&G where he represented the department in the Board of Fisheries process. Since retiring in 2015 Jeff has done fisheries recertification worth with the Alaska Seafood Marketing Institute and has worked as a technical advisor to BBSRI.

PC99

Submitted by: Stuart Jones
Community of Residence: Kenai Penninsula

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Stuart Jones, 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,

Stuart A. Jones

USMC (ret.)

F/V Sophia Marie- Bristol Bay Deckhand

PC100

Submitted by: Frances Kaul
Community of Residence: Winthrop, WA

I am a Bristol Bay Fisher woman who started fishing in 1987. I would like to express my opposition to proposals 44, 61, 62, 63, 64, 65, 66, 67, and 68. These proposals could greatly impact the harvest of those of us commercial fisherman who fish in the Nushagak. These proposals would restructure a management plan that has yet been given the time to be evaluated. Why would the BOF even consider resetting the clock and change the structure of the plan before it has had time to be evaluated properly?
