

**Submitted by:** David Reutov  
**Community of Residence:** Homer, Alaska

David Reutov on the f/v Typhoon  
Bristol Bay fisherman of 8 years.

I oppose proposals 44, 61-68.

Closed fishery before June 28 would be a great financial loss and impact our lively hood by not harvesting upwards of 7 million fish and over escape the rivers, which in turn would impact the return runs for the future.

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PC203

**Submitted by:** Julian Reutov  
**Community of Residence:** Homer

My name is Julian reutov and I commercial fish in Bristol bay to provide for my family. I oppose proposal 44, 61-68 because all of these proposals would limit me to fish an already short season and over escape the rivers like crazy. I fish in the Nushagak river almost every year and I barely catch any kings if any because the kings run a bit earlier. Instead of limiting us to fish and over escaping the rivers I think the board of fish should limit the trawlers on how much kings they can dump over board and only maybe then our kings will return. Thanks.

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PC204

**Submitted by:** Mark Reutov  
**Community of Residence:** Homer

Do close nush

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PC205

**Submitted by:** Philip Reutov  
**Community of Residence:** Homer

As a fisherman and drift permit holder of bristol bay i oppose the propositions of regulatory changes to Nushigak and Naknek districts.

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PC206

**Submitted by:** Trifilyi Reutov  
**Community of Residence:** Homer

Hello to all Staff and Board Members. Iam a Bristol Bay fisherman for 28 years and my family. I would like to Oppose Proposal 44 and 66 to 68 Please leave it unchanged. Leave it as is or it will take a lot of reduced time out of our fishery and big percentage of our income. So iam asking Please leave it as is. Thank you.

From: Scott Raborn [REDACTED]  
Subject: PMTF Catch Update #12, June 21, 2025  
Date: Jun 21, 2025 at 10:43:04 PM  
To: [REDACTED]

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# Port Moller Test Fish Catch Update

## Catch Update #12, June 21, 2025

[PMTF Catch Update Table](#)

[PMTF Raw Data](#)

Good evening,

Yesterday, we reported that the R/V St. Andrew was only able to fish at Station 4. However, the crew managed a late set at Station 8 as well, yielding a sizeable index of 234.

Today, the vessels successfully covered all but Station 2. The fish band between Stations 6 and 10 remains robust, and catch indices at the outer stations have increased significantly.

So far, the catch indices at Port Moller suggest the run might be larger than forecasted or arriving earlier than observed in recent years. The current data provide no indication that the run is significantly late or smaller than forecasted.

**PMTF Stock Composition Status:** If weather permits, the June 19-20 stock composition should be released tomorrow.

#### Index by Station

S2: Not fished

S4: 44

S6: 216

S8: 143

S10: 79

S12: 0

S14: 24

S16: 19

S18: 90

S20: 91

S22: 58

S24: 38

Daily Catch Index = 70

Jordan and Scott

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## Useful Links & Project Info

PMTF Website Project Page ([Click Here](#))

BBSRI Inseason Data Page ([Click Here](#))

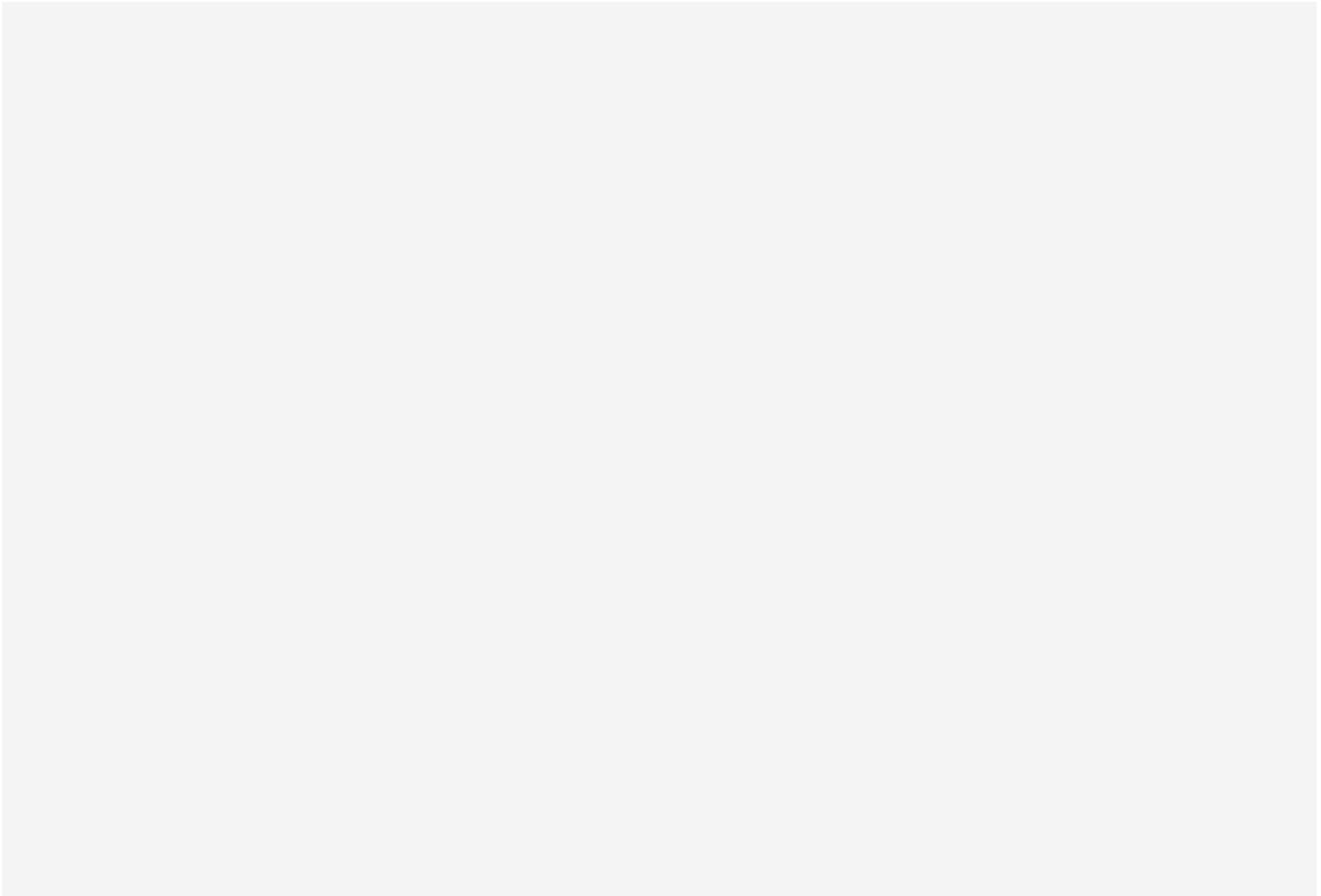
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**Community of Residence:** Ekuk

I want to support proposals 56,57,80 but do not support the King Salmon management plan. In my opinion the issue is on the high seas and making salmon fishermen in the Nushagak district sit on the beach while a few King Salmon swim by to allow the sport fishermen to decimate them once they get in river is ludicrous. Catch and release doesn't work either. And while I'm at it stop the subsistence targeting the biggest King Salmon they can catch. If it's truly about subsistence then let them fill their freezers and smokers with Red Salmon. In conclusion the damage to the Kings started in the late 80s and continues to this day and it's all done with the Trawler fleet. Not all of them are under your jurisdiction. This is a problem for the Federal Government and it will take a half century to correct.

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Submitted by: Joel Reynolds

PC208

Ekuk Beach Fisherman's Association

**Community of Residence:** Ekuk, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Joel Reynolds and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. I have been fishing Ekuk beach since the 1980's. 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.

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.

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,

Joel Reynolds

Ekuk Beach, Nushagak District

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**PC209**

**Submitted by:** Kim Rice

**Community of Residence:** Girdwood, Alaska 99587

Proposal 80

Our family fishes 4 Bristol Bay setnet permits in the Egegik district. We have been Set netting in Egegik since 1987. We strongly support Proposal 80. This is not permit stacking. Proposal 80 would allow 2 setnet permit holders to form a coop together and be able to sell their catch on 1 permit. Example: one permit holder is in skiff and sells to tender that is anchored off our site while the other permit holder is picking another net and delivers to Beach market, at this point, fish are mixed between the 2 permits.

Example: I'm a 75 year old permit holder, I would form a co-op with my Daughter, she runs the single skiff that we fish out of. I fish the beach nets, she fishes the outside nets and delivers to floating tenders, I fish the beach nets and deliver to beach market, fish are mixed at this point. My wife's permit would be co-oped with my son-in-law to do the same. He fishes out of same skiff that my daughter runs. we fish the 4 permits at same time, fish get mixed up sometimes. I hope that Board of Fish will pass Proposal 80. I will be at the BOF meeting in January, I plan on speaking to all Board members at that time. I am a member of the Lower Bristol Bay Advisory Committee, our committee passed prop. 80

Thank You

Kim Rice

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**PC210**

**Submitted by:** Lawrence Richmann

**Community of Residence:** Hunters Run

I believe that the king salmon boundary line should be moved to the pongo boundary line due to the fact we our on a catch and release program and most spawning grounds are above the pongo boundary line

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PC211

**Submitted by:** Daniel Riggsbee

**Community of Residence:** Pittsboro NC

I am a drift boat captain and a drift permit holder. I strongly oppose proposal 57 creating an out of bounds area for drift boats, even when set nets aren't fishing, is absurd, especially in an area that historically catches a lot of fish.

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PC212

**Submitted by:** Jace Rinker

**Community of Residence:** Bristol bay permit holder

This part of the fisheries is in good order. No need to change dramatically. This would affect all nush fisherman and other river systems due to extra pressure.

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PC213

**Submitted by:** Nathan Rispler

**Community of Residence:** Oregon

support for proposal 81. I believe we are in competition for the best quality fish on the market and we need to explore all options to achieve that.

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PC214

**Submitted by:** Amanda Roberts

**Community of Residence:** Anchorage

Proposal 52 Oppose. The upper area of Egegik should not be fished by drift or setnet. It would give unfair advantage to jet boats, and the river is too narrow to fish. It would give the opportunity for boats to cut off the whole river, possibly damaging small runs of fish that go into different tributaries. This is a terrible idea.

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PC215

**Submitted by:** Jeremy Roberts

**Community of Residence:** Anchorage

You don't need extra river space when there is not enough boats as it is.

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**Submitted by:** Matt Rockness  
Rockin Fisheries

**Community of Residence:** Gig Harbor WA

I am opposed to this proposal. Maintaining control of escapement is paramount to future runs. The dates proposed are detrimental to controlling the escapement in all Nushagak rivers

**Submitted by:** Tom Rogotzke

**Community of Residence:** Hutchinson, MN

Dear Members of the Alaska Board of Fisheries,

My name is Tom Rogotzke, I have been a drift gill net fisherman in Bristol Bay for 27 years and I am submitting written testimony regarding the following proposals. Almost all of my time has been spent fishing in the Nushagak district along with my brother, and my uncle, and dad, who all own their own boats.

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. These things take time.

From a fisherman's perspective, it appears that the chinook population is stable and possibly slightly higher than in the previous few years. My family and I all release any chinook we find in our nets that are healthy enough to continue up the river. I've heard of this same thing being done by a broader group of people we fish with.

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. Please give this a few more years to play out. The population is steady. Stick with the original plan.

Sincerely,

Tom Rogotzke

F/V Katie Blue

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**Submitted by:** Tom Rollman

**Community of Residence:** Eagle River

Proposal 61 - OPPOSED

Proposal 62 - OPPOSED

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Tom Rollman and I am a setnet fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 61 and 62 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,

Tom Rollman

Nushagak Setnetter

**Submitted by:** Lauri Rootvik

Dennis and Lauri Rootvik/ Laurden and associates

**Community of Residence:** College Place, Washington/ Ekuk beach during the summer

I am a life-long Ekuk Fisherman interested in protecting and enhancing the fishery for Set-net fishermen on the Ekuk beach. I have submitted concerns to the board especially re. the Chinook management plan and the Set-net allocation, as well as the boundary limits being enforced to allow Set-net operations to continue without drift fishermen encroaching within the boundary limits.

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## ***EBFA Member Public Comment Template***

### **Alaska Board of Fisheries – Bristol Bay Finfish Meeting**

Madam Chair and Members of the Board,

My name is Sonja Rootvik Ewing, and I am a third-generation, lifelong set-net fisherman 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 pre-emptive 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.

My family and I fish on Flounder Flats, where the tide comes in and out hundreds of feet per tide. As such, we put our pegs and buoys out about 1,000 feet into the mud at the beginning of the season. As the regulations are currently written, a drift fisherman can drive across any part of our lines as long as they don't touch our actual net. We only have 300 feet of net (50 fathoms), but 700 feet of very important rope and gear holding our nets in place. When a boat drives over those lines, many issues can happen. Lines can be cut, making nets float hundreds more feet away from shore, a very difficult and dangerous problem for us to remedy. Buoys can be pulled off the pegs, making an expensive and time-consuming problem for us to fix.

Proposal 57 would help ensure these safety issues do not happen, protecting us fishermen on the beach, as well as the drift fishermen in their boats.

**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.

As a small family operation, my family owns two permits and fishes on the flats about 5 miles from our processing plant. That is about a 30-minute drive by truck. We share crew between the two sites. A joint-venture operation would be incredibly helpful for our operation. For example, if we have a lot of fish, Prop 80 would allow just one permit-holder to drive down the beach to deliver fish, while the second permit holder could stay and help the rest of the crew finish picking and loading the second site, rather than having two main members of the operation be gone for at least 1.5 hours in the middle of a tide. This not only impacts our crew resources, but also helps with fish quality, as they can be dealt with and delivered much faster with more hands “on deck”. It also helps save fuel, because we could deliver in one truck if we have a smaller catch.

I heard someone argue that this would allow set-netters to catch more fish, which is very untrue, at least in my family’s case! When the tide goes out, it’s out, and there are no more fish to catch. Proposal 80 would simply make it a lot easier for our small, two-permit operation to work together, and would reduce the strain of having each permit-holder deliver fish separately on every trip.

**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,

Sonja Rootvik Ewing

Ekuk Beach, Nushagak District

**Submitted by:** Andrew Rosas

**Community of Residence:** Port townsed

I am submitting this comment in opposition to propositions 44 and 61-68. Additional restrictions of soceye fishing in the nushagak to protect the king salmon return is un warranted without more data to prove that is working. There are many things that are affecting poor king salmon returns including trawling by catch subsistence fishing as well as sport fishing. None of which have seen the same scrutiny that the bristol bay fleet has. Also preventing the fleet access to early soceye will continue to over escape the nushagak river at unprecedented levels. Very been a bristol bay drift fisherman since 2005 and I believe king salmon are very important the declining returns are not the result of of drift and set fisherman catch and untill the problem can be isolated and more data can be gathered it is unacceptable to further limit soceye fishing in the nushagak district. Thank you.

**Submitted by:** Erick Sabo

**Community of Residence:** Arizona

Dear Members of the Alaska Board of Fisheries,

My name is Erick Sabo, 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,

Erick Sabo

F/v Insanity

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**Submitted by:** Ed Saffer

**Community of Residence:** Spokane, WA

“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”

**Submitted by:** Konrad Schaad

**Community of Residence:** Homer Ak

- Opposed to proposals 48 and 49. Micro managing for any gear group that feels short changed gets very complicated and cumbersome. We need to let the biologists focus on biology first and not burden them anymore with special wishes.

-Strongly opposed to proposals 61, 62, 64, 65, 66, 67, 68, 69. They make no sense until we have an accurate way to count kings. Tim Sands is doing a great job; we don't need to tie his hands any further to achieve the best possible outcomes.

-Support proposal 70; Diffuse the Ugashik Northline by giving more space to fishing boats.

-Strongly support #71, 72, 73, 74. Late season when all districts achieved or exceeded their escapements, and enforcement is usually gone, it makes no sense to corral the fleet in districts where a few boats that push the boundaries are "rewarded" with higher catches. Dispersing the fleet in a general district produces better fish quality and gives equal opportunities to all fishers, and takes pressure of enforcing lines off for the troopers ( which don't have the funds to do much at this late time in the season)

-Strongly support proposals 75, 76, and 78; There are too many permits in the Bristol Bay fishery. This is a great way to permanently reduce the fleet. This is a free " buy back". Each D permit eliminates 100 fathoms of fishing nets; a win / win for all.

-Opposed to # 82 and 83; this is nit picking for some special interests. Why not get rid of the antiquated 32ft limit all together?

-Support #84 and or 85; It makes great senses to come up with a length that includes all add ons ( anchor roller, power roller, trim tabs, Jets and it's protective pipes). Either no length limit or something that works for all. But if we can't come up with an overall length ( no exceptions), we need to clarify the current jumble of what is in, and what not (#85)

-Support proposal 95; Since we lost "free week" we have a lot at stake when we drop our blue cards. This would enable many boats to go test the boat, and the crew.

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**Submitted by:** Cameron Schille

**Community of Residence:** Stanwood, WA

As a Captain, Boat owner and Permit holder with 21 years experience in Bristol bay's wonderful commercial salmon fishery. I strongly oppose proposals 44, 61-68.

I am asking the board to 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.

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Franz Schonberg

F/V Myrna Mae

Public Comment in opposition to Proposal 61

My name is Franz Schonberg, a 30 year old drift commercial fisherman in Bristol Bay who lives in Petersburg, Alaska with my wife Seaira and our 4 month old daughter Dagny. I started drift fishing in Bristol Bay with my father in 2008 when I was 13 years old. He started fishing in Bristol Bay in the early 80's with his brother.

I strongly oppose proposal 61 for many reasons:

1. As BBSRI will share in their report, the commercial drift and set net fleet in the Nushagak has lost on average over 40% on the front end of the most productive sockeye salmon river in Bristol Bay from June 21-July 4<sup>th</sup> under the current King Salmon Management plan. This period we've given up for king salmon conservation has cost the industry thousands of pounds of sockeye salmon. As an example, if the board eliminated the triggers in 2025 and the fleet did not fish until June 28<sup>th</sup>, there would have been millions of sockeye salmon up those rivers well beyond the OEG's set in place under the King Salmon Management Plan. Fish do not run in accordance to dates set on a calendar. The biological impact of allowing unprecedented amounts of sockeye to spawn up river has been shown around the state to reduce returning runs. That is why ADF&G sets the escapement goals in the first place, to achieve the balance necessary to maximize harvest and guarantee future runs. These numbers have been achieved by trial and error for a number of generations. Pounds = dollars, lost harvest opportunity negatively impacts local borough tax revenue, state tax revenue and many thousands of downstream players that are involved with bringing this product to market. Mother Nature does not reference dates set on a calendar to decide when they want to swim upriver. The commercial fishermen have compromised in the name of king conservation and given up a lot already, this proposal will further limit the profitability of the industry.
2. The King Salmon life cycle is longer than the 3 year board of fish cycle, meaning the results of our sacrifice have not even been given a chance to yield and study the results.
3. Bristol Bay exists as it is today and has for generations because of this commercial industry, taking legislative action not based on science and results will further disenfranchise those who "start from the bottom". It has already become hyper competitive. With inflation coupled with difficult market conditions, it has been exceptionally difficult to survive the times unless you are in the upper tiers of production. Local Alaskan residents like myself who started from a young age, without

an inheritance or handout will be further disenfranchised. Recruitment into this industry is already a big enough challenge, why make it harder?

4. Bristol Bay Regional Seafood Development Association collects revenue from a 1% tax on all commercial drift net fishermen in Bristol Bay. BBRSDA sent out an RFP this fall to increase sonar capacity near the current ADFG sonar site at Portage Bay up the Nushagak River. BBRSDA is working closely with ADF&G and BBSRI, to fund the installation and oversight of this project with the goal of improving upon a sonar system that was designed to count sockeye salmon. The idea will be to increase sonar capacity and to train an AI model to differentiate species of salmon that are being documented with the additional sonars. This is a difficult task considering the amount of sockeye the Nushagak River has been yielding in recent years and the unique characteristics of the river. The project will begin this summer and will bring together teams of scientists with experience from around the continent working together to solve a problem. This project will cost hundreds of thousands of dollars and require cooperation from many partners. Without the hard-working tax payers of the Drift gillnet fleet, this would not be possible. The state has cut ADF&G budgets significantly in the last decade making their job exceptionally more difficult without proper financial incentive. Our scientists work under extremely stressful conditions with minimal compensation as it is. I have a lot of respect for what they are able to achieve under the circumstances they are under. This project is a great example of industry stepping up to the plate to solve an issue.

It begs the question, what has the sport fish industry done and spent for king salmon conservation in the Nushagak River? Barbed hooks? There are laws all across this state that require anglers use barbless hooks for steelhead runs to improve the likelihood of survival after catch and release. Bait? You can't use scented bait or eggs to catch steelhead because they swallow the hook deeper making extraction highly likely to kill the fish if it is not a legal size.

My great grandfather, Laugi Thorstenson, was counting salmon on a tally scow at Clarks point in the 1940's. During this time Laugi's brother Jonas worked at the Peter Pan plant as a mechanic keeping the "Iron Butcher" running for the cannery. These canned salmon helped feed the Allies in WW2. Though my family was not active in the industry, these canned salmon also helped feed the Allies in WW1.

My 2 older brothers, Johannes and Karl grew up commercial fishing and we all fished together on my dad's boat in Bristol Bay before they went to the Naval Academy. They still serve today as Commanders in the Navy. The experiences we shared together on the back deck of that 32' gillnetter helped set them apart from other candidates and was critical to their development. It

has been critical to the development of many strong and independent leaders of this country for over a hundred years.

At an early age I had a dream to focus on building a family and I wanted to give my unborn children an opportunity to work side by side with their father during their crucial developmental years. There are so few places in the world where you can spend a summer focused on building skills and connections with your children like this. At age 23 I bought my first gillnetter, the F/V Sea Spy a 12' wide Modutech built in 1980. It was a major learning curve and a humbling first couple of seasons that only worked with endless support from processors, fellow fishermen, friends and family and my wife and opportunities to harvest sockeye salmon. I have since upgraded to a 1980 Jumbo Modutech F/V Myrna Mae and continue to rely on successful fishing seasons to support my family along with HVAC and refrigeration work the rest of the year out of Petersburg.

I share this story as an example of the American dream that Bristol Bay has been for my family for generations. I am confident my story will resonate with a lot of folks who commercial fish in Bristol Bay every summer. To come from poverty and be able to work up to the middle class and provide a healthy, beautiful sockeye salmon for the world to eat is a blessing that should not be ignored. This region has been blessed with an abundance of wild sockeye salmon in the last decade and counting. Simultaneously the entire west coast of North America has seen a major decline in King Salmon stocks for reasons science has yet to pin point.

Bristol Bay and the commercial fishing industry has developed leaders in this country for generations. It has fed soldiers during some of humanity's darkest wars, it continues to deliver some of the highest quality protein on this planet to people regionally and internationally, it continues to be a place where independent family oriented folk can achieve the American Dream.

I ask the board of fish to heavily consider the price this industry and the region will pay if this proposal is approved. Consider the 46 permit holders based out of Petersburg, Alaska alone who depend on this fishery to feed their families. Consider the many communities in Alaska that have residents who also depend on this fishery. Consider the economic impacts to the watershed region if the industry continues to lose solvency.

I encourage board members to reach out and ask questions about my story. I will be attending the meetings and look forward to meeting with you all.

with all due respect,

Franz, Seaira and Dagny Schonberg



PC227

**Submitted by:** Kristian Schonberg

**Community of Residence:** Allyn, WA

I am a commercial fisherman and have fished Alaskan waters since 1971. In 1983, I started fishing salmon in Bristol Bay. In 2005, I bought a permit and boat, the Ghost rider. I depend on the harvest in the Bay and especially in the Nushagak district. I oppose any change of plan for the management of the system and would hope that our current management plan helps keep the king salmon runs healthy.

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PC228

**Submitted by:** Quinn Selitsch

**Community of Residence:** Anchorage

My support or opposition to these proposals are marked below. If I have not marked support or opposition for a proposal, this should in no way affect my support or opposition for those proposals I have marked support or opposition for.

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PC229

**Submitted by:** Tristan Selitsch-Hager

**Community of Residence:** Anchorage

I want to voice my opinion regarding props 61-68. Sports fisherman often times come from out of state and don't really actually care about the fisheries or the towns in which they come to and from. Commercial fisherman have already given up so much fishing time. I remember thinking we didn't have enough time as it was to put in a proper season to financially keep up. I have commercially fished there since I was 16. I recently bought a Bristol bay boat this year so I do have skin in the game, however the past five years at least, every king we've caught in Bristol bay that is alive, we let free to have a shot of getting up there river. I am an active member in all sorts of communities and fisheries over Alaska, from anchorage to Akutan. I feel like the sports fisherman will just keep taking as much as they can get and will never be satisfied. You give an inch and they ask for mile. Enough has to be enough eventually.

Thank you

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PC230

**Submitted by:** Cameron Severson

**Community of Residence:** Petersburg AK

My name is Cameron Severson, 4th generation commercial fisherman from Petersburg, Alaska. I own the fishing vessel Loki, two permits, and have been an owner/operator in Bristol Bay for the last ten years. I also am part owner/operator in the F/V Odin and participate in SE seining, GOA blackcod/halibut, and Or/Wa dungeness in the winter. I am writing to express my opposition to proposals 44, and 61-68. I readily agree that we have a statewide problem of low King salmon abundance. Alaska also is the benchmark for fisheries management practices around the world. The current proposals aim to take the power away from fisheries biologists, like Tim Sands in the Nushagak,

and give it to a political body. This not only is a bad idea in itself but it reduces the management flexibility needed to effectively maximize both the economic value and the continued health of the greatest salmon run left in the world. It's a delicate balancing act managing booming sockeye runs while facing reduced king escapement in the same waters. One that is best left to a professional biologist not a political body.

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PC231

**Submitted by:** Shiloh Seymour

**Community of Residence:** Homer Alaska

185 I oppose this proposal Kings are not a significant portion of the run and should not dictate the management of the much more prolific Sockeye.

45 I appose this proposal. Things have worked great for years I don't see any reason to change them.

57 I oppose this proposition. Many of the areas that we fish in the new Check have huge title fluctuations, often time leading to wide open water inside of the setnets. While i understand the issue with entanglement. Such a broad reaching regulation wouldn't be good for the whole of the district.

61 I oppose this proposition. Anything proposed by the Kenai sports fisherman Association should be thrown out they are not a vested party in Bristol Bay. They are a special interest group without traditional use.

62 oppose this proposition. Anything proposed by the Kenai sports fisherman Association should be thrown out they are not a vested party in Bristol Bay. They are a special interest group without traditional use. furthermore I lost my childhood fishing grounds to special interest groups like them I grew up fishing Cook inlet. I left to come to the bay because of organizations like theirs.

70 agree this seems like a good solution to give us fishing time in the Wood River while giving Kings the opportunity to go up the nushigak.

71 agree tired of letting the illegal fisherman get all the fish.

72 agree this would provide much better equal opportunity to fish legally.

73 agree again anything to get us off of the North line we're only a few lawbreakers reap the rewards with little to no consequence.

74 any one of the general district plans would work to make the fishing fair instead of letting a few individuals breaking the law get all the fish.

75 agree, this would be helpful in both gear reduction, and put permits into the hands of the most active fisherman.

76 agree I am in favor of permit stacking, reducing overall gear in the water, and giving a person the opportunity to have full control of there operations.

77 agree I really like the idea of the E permit being irrevocable. This would permanently reduce boats making each operation more profitable.

78 agree. I am in favor of permit stacking, reducing overall gear in the water, and giving a person the opportunity to have full control of there operations.

79 oppose. This is a land grab trying to keep drifters out of some of the most productive waters in Bristol Bay. The set nets already have the best spots locked down.

80 strongly oppose. This is being done in an effort to push drift fisherman out of traditional areas we have finished.

81 oppose. This violates traditional use, and is a foothold towards losing our fishery.

82 agree we need solid definition on the 32' rule.

83 agree this would be very helpful to have this more defined and easy to understand

84 oppose this would make all 32 foot vessels less valuable than newer vessels made, it would degrade our investment into 32 foot legal boats.

85 agree but this proposal needs refinement.

86 agree this needs a clearer definition for the shorter boats.

87 agree this is huge for our overall quality. It needs to be added to the list of exclusions to the 32 foot limit. Transom coolers are vital for any both of fishes in shallow water. The only other option is to turn your RSW off. We want to deliver cold high-quality fish.

88 agree this is a silly regulation, it only serves to give the troopers another opportunity to take money from Fisherman.

89 oppose this proposal while intended to only address the anchor issue excludes Jet drives Fish dropout baskets transom coolers. And many other necessary safety items. I like the idea it just needs more refinement.

90 agree I had to cut my roller off my brand new boat even though I felt that I was legal because the troopers decided that the mount my roller was sitting on was not a part of the roller. This had a significant financial impact on me the very year after I built my brand new boat. And I had to cut up my brand new boat. Many other boats in the fleet have gone like this for years and it's never been an issue.

91 agree this would be super helpful to get nets out of Jet drives and not have my crew in danger. It's a critical safety device.

92 oppose late season fishing is historic, and many families depend on it. It is not a significant impact on the overall run, and generally by this time all the runs have received their escapements.

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Madam Chair and Members of the Board,

My name is Maggie Shade, and I am a set-net permit holder / crew member / 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.

### **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,

**Maggie Shade**

**Ekuk Beach, Nushagak District**

**PC233**

**Submitted by:** Chad Solbakken

**Community of Residence:** Comano Island

Strongly oppose prop 44

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**PC234**

**Submitted by:** Suzanne Springer

**Community of Residence:** prescott az

Proposal #102. the requested changes are minimal and will enhance out of state visitors fishing experience.

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**PC235**

**Submitted by:** Leon Stafford

**Community of Residence:** Togiak

Would love to have no king retention, would also like prawns for sockeye 5 days earlier. Also moving king place up to the pungokepak

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**PC236**

**Submitted by:** Brad Stapes

**Community of Residence:** Oregon

102

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*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: Kelly Stier  
Bellingham, WA

PROPOSAL 45

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

\*\*\*\*\*

PROPOSAL 46

Same as my response to proposal #45.

\*\*\*\*\*

PROPOSAL 47

Same as my response to proposal #45.

\*\*\*\*\*

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.

\*\*\*\*\*

PROPOSAL 49

Same response as proposal #48.

\*\*\*\*\*

PROPOSAL 50

I agree with the intent of this poorly worded proposal.

\*\*\*\*\*

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.

\*\*\*\*\*

PROPOSAL 52

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

\*\*\*\*\*

PROPOSAL 53

[redacted by boards support-personal attack]. I do not support this rambling proposal.

\*\*\*\*\*

PROPOSAL 54

I support this proposal.

\*\*\*\*\*

PROPOSAL 55

If I'm reading this correctly, it is the same intent as proposal #54.

\*\*\*\*\*

PROPOSAL 56

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

\*\*\*\*\*

PROPOSAL 57

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

\*\*\*\*\*

PROPOSAL 58

I'm not sure I understand this proposal's impact.

\*\*\*\*\*

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.

\*\*\*\*\*

PROPOSAL 60

Neutral on this one.

\*\*\*\*\*

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.

\*\*\*\*\*

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.

\*\*\*\*\*

PROPOSAL 63

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

\*\*\*\*\*

PROPOSAL 64

I agree with the logic of this proposal.

\*\*\*\*\*

PROPOSAL 65

1<sup>st</sup>, king salmon counting needs to more accurate. 2<sup>nd</sup>, 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 do not support this proposal.

\*\*\*\*\*

PROPOSAL 67

Again, we need accurate counting first.

\*\*\*\*\*

PROPOSAL 68

Accurate counting first.

\*\*\*\*\*

PROPOSAL 69

Without accurate counting, we cannot make rules like this.

\*\*\*\*\*

PROPOSAL 70

Neutral on this one.

\*\*\*\*\*

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.

\*\*\*\*\*

PROPOSAL 72

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

\*\*\*\*\*

PROPOSAL 73

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

\*\*\*\*\*

PROPOSAL 74

I support this proposal.

\*\*\*\*\*

PROPOSAL 75

Permit stacking has many benefits. I strongly support this.

\*\*\*\*\*

PROPOSAL 76

I support this proposal.

\*\*\*\*\*

PROPOSAL 77

I don't see this as necessary if permit stacking is allowed.

\*\*\*\*\*

PROPOSAL 78

Long winded pitch for permit stacking.

\*\*\*\*\*

PROPOSAL 79

No opinion on this gear type in this area.

\*\*\*\*\*

PROPOSAL 80

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.

\*\*\*\*\*

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.

\*\*\*\*\*

PROPOSAL 83

Why limit to 36'? Remove the limit all together.

\*\*\*\*\*

PROPOSAL 84

Remove the limit.

\*\*\*\*\*

PROPOSAL 85

Remove the limit.

\*\*\*\*\*

PROPOSAL 86

Remove the limit.

\*\*\*\*\*  
PROPOSAL 87

Remove the limit, not just the rule that affects your boat.

\*\*\*\*\*  
PROPOSAL 88

Remove the limit, not just the rule that affects your boat.

\*\*\*\*\*  
PROPOSAL 90

Remove the limit, not just the rule that affects your boat.

\*\*\*\*\*  
PROPOSAL 91

Remove the limit, not just the rule that affects your boat.

\*\*\*\*\*  
PROPOSAL 92

I've caught a lot of sockeye in the Naknek/Kvi district after July 25<sup>th</sup>. I don't support this proposal.

\*\*\*\*\*  
PROPOSAL 93

I'm neutral on this.

\*\*\*\*\*  
PROPOSAL 94

Neutral on this proposal.

\*\*\*\*\*  
PROPOSAL 95

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

\*\*\*\*\*

**Submitted by:** Robb Stilnovich

**Community of Residence:** Fircrest, WA

Dear Members of the Alaska Board of Fisheries,

My name is Robb Stilnovich, 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,

Robb Stilnovich

F/V Dalmacia

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**Submitted by:** Erwin Stroosma

**Community of Residence:** Bristol Bay

Dear Members of the Alaska Board of Fisheries,

My name is Erwin Stroosma, I am a 35 year drift gill net fisherman in Bristol Bay. I married into a Bristol Bay watershed family and have been fortunate enough to run a family operation that has included my three kids, multiple nephews as well as numerous family friends.

I am concerned about potential changes that would amend a plan that has been developed by Bristol Bay stakeholders. As such, I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

With appreciation,

Erwin Stroosma

f/v Emma Corina

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Dear Members of the Alaska Board of Fisheries,

My name is Chad Studebaker. I am a Bristol Bay commercial fisherman and owner-operator with over a decade of experience fishing in the Bay. I submit the following comments on the Bristol Bay Finfish proposals based on my on-the-water experience and my concern for the long-term sustainability of the fishery as both a biological resource and a working industry.

Effective fisheries management must balance conservation goals with economic reality, enforceability, and cumulative impacts. Regulations that steadily reduce commercial viability do not strengthen conservation outcomes; they weaken the very sector that provides accountability, monitoring, and long-term stewardship of the resource.

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

**\*\*Position: Oppose\*\***

I oppose Proposal 44. Subsistence fisheries should not be targeted with new limits or reporting requirements without clear evidence that such measures will materially improve Chinook escapement. In the absence of an established Amount Necessary for Subsistence (ANS) for Chinook in the Nushagak, this proposal risks creating social conflict while failing to address the primary factors affecting stock productivity.

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### **\*\*Proposals 61–68 – Expanded Chinook Stock of Concern Restrictions\*\***

**\*\*Position: Oppose\*\***

I oppose Proposals 61 through 68. The commercial fleet, particularly the drift fleet, has already experienced significant conservation-related restrictions under the existing Stock of Concern framework, including delayed openings, reduced fishing time, and inseason closures. These measures have had substantial economic impacts, yet Chinook escapement challenges have persisted even in years with limited or no commercial harvest.

Further automatic or extended restrictions risk compounding economic harm without demonstrating additional conservation benefit, while reducing management flexibility needed to respond to tides, weather, and actual run behavior.

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### **\*\*Proposal 64 – Allocation Changes During SOC Conditions\*\***

**\*\*Position: Oppose\*\***

I oppose Proposal 64. Conservation designations should not be used to alter allocation among user groups. Allocation changes made under Stock of Concern conditions risk becoming long-term precedent unrelated to biological effectiveness and undermine established access frameworks.

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

**\*\*Position: Support\*\***

I support permit stacking within a gear group. Permit stacking improves safety, efficiency, and economic viability without inherently increasing fishing power or conservation risk. Given existing time and area constraints, stacking allows permits to remain active and helps maintain a stable, enforceable commercial fleet.

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

**\*\*Position: Support\*\***

I support reasonable updates to vessel specifications, including vessel length. Modern vessels improve safety, efficiency, and product quality. Restricting vessel modernization does not protect fish, but it does increase operating costs and erode the long-term viability of the commercial fleet.

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**### \*\*Cumulative Impacts and Long-Term Considerations\*\***

The commercial fleet provides the majority of enforceable harvest data, economic value, and management accountability in Bristol Bay. Continued concentration of restrictions on this sector reduces fishing area, compresses time, increases congestion and fuel costs, and undermines economic sustainability.

If commercial viability declines, pressure does not disappear; it shifts toward less regulated sectors, weaker enforcement environments, and reduced political capacity to defend Bristol Bay as a public resource. Long-term conservation success depends on maintaining a fishery that is biologically sustainable, economically valuable, and politically resilient.

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**### \*\*Closing\*\***

I respectfully ask the Board to evaluate these proposals cumulatively and to avoid further regulatory changes that undermine commercial viability without clear, measurable conservation benefit. Protecting the fishery requires protecting both the fish and the people who depend on them.

Thank you for the opportunity to comment.

Respectfully,

**\*\*Chad Stuebaker\*\***

Bristol Bay Commercial Fisherman

Owner-Operator

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**PC241**

**Submitted by:** Joseph Sukalski

**Community of Residence:** Naknek

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 in March 2023 and has not been in place long enough to evaluate its effectiveness over a full Chinook generation. Restructuring the plan now is premature and unnecessary.

These proposals would reduce management flexibility and create significant risk to the commercial sockeye fishery, with the potential loss of millions of fish and serious economic harm to fishermen, processors, and local communities. Existing tools already allow managers to conserve Chinook salmon while responding to real-time run information.

I respectfully urge the Board of Fisheries to reject Proposals 44 and 61–68 and leave the current management plan unchanged until it can be properly evaluated.

**Submitted by:** Reba Temple

**Community of Residence:** Petersburg, Alaska

I oppose Proposal 61, 62, and 69. The Bristol Bay salmon fishery is only viable for commercial fishermen if they are able to fish in all four districts. If the Nushagak has additional king regulations imposed, fishermen will be forced to crowd into the other three districts. This could cause extra pressure on the salmon stocks in those rivers, as well as a decrease in catch per vessel. It would make it harder for fishermen to make money in the fishery. Instead, it seems worthwhile to focus on better king counting technology so that Fish and Game is more able to differentiate between sockeye and king salmon as they go up the river.

I support Proposal 75 and 76. If a husband and wife are each permit holders who fish Bristol Bay, it becomes very hard for them both to continue in the fishery once they have kids. By allowing permit stacking under one individual's name, both of their permits can stay in the family and continue fishing.

I support Proposal 95. My first years running a boat thankfully fell during the years when there was a "free week." This time period in the season was invaluable for me as I got to practice setting my net and helped me learn my boat. However, I do appreciate how it was a regulatory nightmare for Fish and Game as boats were able to buzz between districts. Proposal 95 seems like a very creative solution to this problem. It allows for early season "practice fishing" to help the captain and crew, while also maintaining district registration.

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**COMMENT ON PROPOSAL #81****Alaska Board of Fisheries – Bristol Bay Finfish Meeting  
January 2026**

To the Alaska Board of Fisheries,

In addition to submitting this comment in support of **Proposal #81**, I respectfully encourage the Board to explicitly authorize and support greater flexibility for the **ADF&G Commissioner to implement experimental and pilot harvest programs**, similar to the 2024 Kenai beach seine tests conducted under commissioner-approved special provisions.

Those Kenai experiments provided the industry and managers with rare, real-world insight into alternative harvest methods that would not have been available through theory or modeling alone. As an industry, we are facing rapidly changing environmental, biological, and market conditions. Relying exclusively on what “we have always done” is no longer sufficient to ensure long-term viability. Carefully designed, tightly monitored experimental fisheries are one of the few responsible tools available to explore better outcomes before constraints force reactive and potentially more disruptive management decisions.

My family and my wife’s family have participated continuously in the Bristol Bay commercial salmon fishery since 1948. Our primary household income is derived from this fishery, and our perspective is informed not only by multigenerational participation, but by direct involvement in harvesting, marketing, and selling Bristol Bay sockeye into the modern U.S. seafood market.

I am submitting this comment in support of **Proposal #81**, and more broadly to encourage the Board to seriously consider the role of **non-entanglement harvest methods** as a management tool for the long-term viability of the Bristol Bay fishery.

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**The Bristol Bay Harvest Model Lacks Competitive Advantages**

The current Bristol Bay harvesting model is increasingly misaligned with contemporary market realities. While Bristol Bay remains biologically productive, the harvest system itself produces artificially degraded quality, high operational and management costs, unnecessary safety risks, and limited flexibility in addressing mixed-stock conservation concerns.

Over the last three decades, the seafood marketplace has changed dramatically. Farmed salmon now dominates retail space and consumer mindshare, Russian fisheries are increasingly utilizing non-entangling harvest methods with near-total utilization, and buyers and consumers place growing emphasis on freshness, consistency, and sustainability narratives that extend beyond volume alone.

At the same time, ex-vessel price volatility has introduced real economic instability for permit holders, processors, and local communities. The existing model increasingly treats fishermen as a price buffer rather than as value creators, despite exclusive access to the resource.

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## Why Incremental Quality Improvements Are No Longer Enough

For more than twenty years, fishermen, processors, and communities in Bristol Bay have invested heavily in quality improvements: bleeding protocols, chilling and floating practices, brailer bag limits, infrastructure upgrades, ice availability, and post-harvest product innovation.

Despite these efforts, when adjusted for inflation, the 2023 base price for Bristol Bay sockeye was the lowest ever paid. The largest gains achievable within a gillnet-only harvest framework have already been realized. Further improvements from this point forward are increasingly costly and yield diminishing returns at retail.

If Bristol Bay wild salmon is to meaningfully differentiate itself from farmed alternatives in the American consumer market, **structural change**, not incremental optimization, is required.

## A Path Forward: Non-Entanglement Harvest Methods

Proposal #81 represents an opportunity to evaluate alternative, non-entanglement harvest methods operated by existing limited-entry permit holders. Examples include beach seines, fyke nets, fisherman owned fish wheels, and shore-based lead systems with live-holding capability.

These methods are not proposed as replacements for the existing fishery, nor as mandates. Rather, they should be viewed as **research tools and optional harvest strategies** that can:

- Preserve near-perfect fish quality
- Reduce incidental mortality of non-target salmon species
- Lower ecological footprint per harvested pound
- Improve safety and operational efficiency
- Enable meaningful market differentiation and price negotiation

Informal discussions with multiple major Bristol Bay buyers indicate strong interest in salmon harvested by non-entanglement methods, with anticipated premiums in the range of **30-40% per pound or more** relative to conventionally harvested fish.

Fishermen have innovated as much as possible with the current harvest methods, and we need new avenues to innovate further. The goal is not to increase individual permit holder volume, but to **maximize value** from the volumes we each already harvest. If a permit holder could elect to choose from several harvest methods and commit to them for a given year, it would provide options for innovation.

## Empirical Evidence: 2024 Kenai Beach Seine Research

In 2024, commercial fishermen in Upper Cook Inlet operated experimental **set beach seine gear** under commissioner-approved special provisions in response to conservation constraints associated with Kenai River Chinook salmon.

Accurate operational records were maintained. While the fishery was challenging, the results demonstrated that:

- Beach seines could successfully harvest sockeye salmon at commercial scale

- Non-target salmon species encountered during operations could be released alive and unharmed
- The gear could be deployed using existing shore-based infrastructure with limited capital investment
- The harvested product exhibited markedly superior quality compared to gillnet-caught fish from the same region

These results are directly relevant to Bristol Bay. They demonstrate that selective, non-entanglement harvest methods are not theoretical constructs, but practical tools capable of operating under real-world conditions while advancing both conservation and economic objectives.

Additional applied research over the past seven years on the Columbia River further demonstrates the feasibility and value of selective, non-entanglement harvest methods. That work has focused on harvesting hatchery-origin salmon while allowing for the live release of wild stocks through the use of stationary, live-capture infrastructure designed for continuous sorting and handling.

This research program has progressed beyond proof-of-concept and into sustained operational testing, including commercial sale of harvested fish. Several Bristol Bay fishermen have participated directly in these efforts, contributing to both the operation of the gear and the downstream handling and marketing of the harvest. Feedback from buyers of this non-entanglement-harvested product has been consistent: fish quality is markedly superior to salmon traditionally harvested with gillnets in the same region, with improvements in freshness, condition, and overall market acceptance.

Together with the 2024 Kenai beach seine experiments, this body of work demonstrates that selective harvest methods are not theoretical or experimental curiosities, but practical tools capable of operating at scale, producing high-quality product, and advancing both conservation and economic objectives.

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### Why This Matters Now

Bristol Bay faces increasing risk from environmental variability, shifting ocean conditions, and the growing likelihood that conservation constraints for stocks of concern will further restrict traditional harvest opportunities. Other Alaska fisheries—including Cook Inlet and Kodiak—have already experienced significant economic and operational impacts under similar pressures.

Addressing these risks proactively through research and limited pilot programs is far preferable to reacting later under crisis conditions. Non-entanglement harvest methods offer a credible means of improving quality, reducing mixed-stock risk, and restoring greater economic agency to fishermen.

Putting better tools in the hands of independent permit holders does not weaken Bristol Bay's heritage—it strengthens its future. The next generation of fishermen deserves a fishery that is competitive, resilient, and capable of thriving in the modern marketplace.

For these reasons, I urge the Board to support **Proposal #81** and to encourage continued, data-driven experimentation and innovation under commissioner authority in Bristol Bay and other Alaskan fisheries.

Respectfully submitted,

Reid and Eike Ten Kley, lifetime Bristol Bay fishermen and permit holders.

2026 Bristol Bay Finfish  
Written Testimony

Rick Tennyson

[REDACTED]

Dillingham, AK 99576

[REDACTED]

[REDACTED]

I have commercial drift fish Bristol Bay since 1974, before limited entry. My four children also fish Bristol Bay. Thank you for reading my testimony and serving on the Board of Fish.

Proposal 44:

I oppose this proposal. King Salmon are a very important subsistence food for water shed residences. Sport fishers should not be allowed to fish until escapement of king salmon has reach 55,000.

Proposals 45-53:

No comment

Proposal 54 & 55:

I'm confused, ADFG wants to stop managing for silvers, but is holding fisher's feet to the fire for king salmon management in the Nushagak River. All Bristol Bay Rivers king salmon escapement numbers are struggling, but no king salmon management plan for the other rivers, only the Nushagak River. Why?

Proposal 56 & 57:

I oppose these proposals: there needs to be GPS coordinates describing such a line. There are times when set nets are not fishing, processor stop buying, weather prohibits set net fishing, set net operator has moved operation into Wood River to fish. When this happens drift nets should be allowed to fish inside this line.

Proposal 58:

I do not understand this proposal enough to support or oppose it.

Proposal 59:

I support this proposal. It's a fare solution for both gear types.

Proposal 60:

I oppose this proposal. Set nets at 25 fathoms allows for set nets further up stream to share in the wealth. The Wood River is not a very wide river and 37 fathom net would be very effective for the front-line sites and not letting other sites to catch fish.

Proposal 61, 62 & 66:

I oppose these proposals. I support not letting sport fishers to fish until 55,000 king salmon escapement has been reach and 95,000 escapement goal is forecasted to be met.

Proposal 63:

I support this proposal: With the King Salmon Management plan in affect. The sport fishing has been fantastic on the Nushagak River, according to social media posts by the lodges and clients. Sport fisher also needs to share in the conservation of king salmon. I support not letting sport fishers to fish until 55,000 king salmon escapement has been reach and 95,000 escapement goal is forecasted to be met.

Proposal 64:

I support this proposal. This proposal would give management a tool to help reduce over escapement. Especially when big pushes of fish enter the river.

Proposal 65:

I oppose this proposal. Bristol Bay has a set net allocation plan that was based on historic catch when the bay was full of set netters, and we fished a minimum of 12-hour openings. Today there are much less active set net sites thus less catching capacity, and we fish shorter fishing periods, generally 6 hours. But yet the set net allocation has remained the same, fish migrations has also change from beach migration to channel migration, depending on season. Take these three changes, less set net sites, fish migration change, shorter fishing periods and some fishing districts set netters are allowed to fish continuously and never come close to their allocation percentage. This has turned some set net operations from marginal operations to gold mines.

Proposal 67:

I support this proposal.

Proposal 68 & 69:

I oppose these proposals. With the Nushagak sonar under counting salmon migration, it is difficult to know what truly is escaping. If the error of under counting the salmon on Nushagak River was adjusted for the error in counting, the king salmon escapement mathematically

would have met its escapement goal for 2023 & 2024 season. We first need to get accurate escapement counts before we start changing the regulations.

Proposal 70:

I oppose this proposal.

Proposal 71,72,73 & 74:

I oppose these proposals. The open district concept may help the drifters but the set net fleet will be negatively affected.

Proposal 75, 76, 77 & 78:

I oppose these proposals. Bristol Bay is already seeing segregation between nonlocal fishers, the haves, and local fishers, the have nots. Nonlocal fishers have other sorts of income which allows them to purchase multiple permits, large jet boats. Where the local fishers have one source of income, fishing. This single source of income needs to sustain life needs. The water shed fishers are a dying breed.

Proposal 79 & 80:

No comment.

Proposal 81:

I oppose this proposal.

Proposal 82:

I support this proposal. With the following changes: b2) fish drop out catcher needs to have a length it can extend past the transom. Currently some extend 18 inches and some 5 feet. 2c) gillnet roller shall not extend beyond the transom. 8) water jets, I've seen different instillation methods, jet unit is recessed into transom, flush with transom and transom boxed out beyond transom resulting in water jet sticking out 3-4 feet beyond transom with fish catcher above. Huge advantage, allows for larger fish holds.

Proposal 83-86, 88-96:

I oppose these proposals.

Proposal 87:

I support this proposal.

Proposal 97-105

No comment.

PC245

**Submitted by:** Benjamin Thomas

**Community of Residence:** Commercial Fisherman from Portland Oregon

Support Proposal 45 - Extend the registration/reregistration deadline in the Naknek-Kvichak District from July 17 to July 22.

Comment:

I support extending the registration dates because the fish have been showing up later every summer. I feel like this adjustment allows for better escapement and seems more fair for different gear types. As a set netter this is important to me.

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 the returns that have been coming later over the past several years and will probably continue that way. It helps us meet our escapement goals and allows me to plan accordingly as I prepare and fish during the season.

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PC246

**Submitted by:** Wes Tibbetts

**Community of Residence:** Anchorage

I have fished in Bristol Bay for over 40 years. Proposal 80 would support me and my family to continue to fish productively and legally.

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PC247

**Submitted by:** Harrison Tiffany

**Community of Residence:** Minnesota

Dear Members of the Alaska Board of Fisheries,

My name is Harrison , I am a drift gill net fisherman captain 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,

Harrison Tiffany

F/V Crawdad

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Submitted by: Togiak River Lodge  
Jordan Larsen, WA State

### **Proposal 96 – Support with Amendment**

We support reducing the number of hooks allowed on the Naknek River. Given the massive volume of salmon Bristol Bay supports, there is no justification for treble-hook rigs. Treble hooks significantly increase mortality on released fish.

We do **not** support a blanket bait ban. Bait can be fished responsibly with very low mortality. On the Togiak River we have successfully used the following rule for years:

**“Bait is allowed only when tipped on a jig/fly or artificial lure.”**

This prevents deep hooking while still allowing effective fishing. A single bare hook with bait dramatically increases the chance of a fish swallowing it.

### **Proposal 97 - Oppose**

### **Proposal 98 – Support with Amendments**

We support reducing the king salmon bag limit on the Naknek River.

Given the ongoing statewide decline in king salmon returns — and the well-documented drops in every Bristol Bay drainage — it is surprising the Naknek has not already seen a reduction. The current limit is simply no longer sustainable.

We ask the Board to amend Proposal 98 as follows: **Bag limit of three king salmon, none of which may exceed 28 inches.**

A 28-inch maximum protects nearly all spawning females while still allowing harvest of smaller males and jacks. This size-based approach has proven effective in other systems and would provide meaningful conservation benefits without eliminating opportunity.

### **Proposal 99 – don’t know enough about the fishery to make a comment**

### **Proposal 100 - don’t know enough about the fishery to make a comment**

### **Proposal 101 – Oppose**

We do not support an all-out bait ban. I think that it is time that sport fisherman and Outfitters to acknowledge that cured salmon eggs are the issue when it comes to using bait. Cured salmon eggs on a single bait hook are the primary cause of most hook up mortalities. It is time for

Selective bait fisheries to be implemented, so that those who want to fish bait responsibly can but are not punished by an all-out ban. Cured salmon eggs are the problem. So, while I don't support this proposal because I don't think all out bans are effective or fair, I do think the Author should propose a selective bait fishery and ban the use of cured salmon eggs.

### **Proposal 102 – Support**

We are the authors of Proposal 102 and fully support it in its entirety.

Opening the bait fishery five days earlier would provide additional opportunity to harvest Sockeye and Chum salmon while maintaining low pressure on King salmon, which remain catch-and-release only in the Togiak River. We have no intention of ever requesting that the Board consider allowing harvest of Kings again. We greatly value our catch-and-release fishery for them; however, we believe there is clear room to continue expanding the Togiak Sockeye fishery given their abundant numbers.

As the primary user group on the Togiak in July, we do not target Kings with bait. We fish exclusively for Sockeye and Chum using salted prawns tipped on marabou jigs.

Regarding the proposal to move the King salmon boundary from the Gechiak River to the Pungokepuk River:

For those unfamiliar with the Togiak, the distance between the mouths of the Gechiak and Pungokepuk Rivers is approximately 5–7 miles. At the 2022 Bristol Bay Board of Fisheries meeting, a boundary was established at the Gechiak based on claims that the majority of Togiak Kings spawn in that stretch. However, several issues have arisen with this boundary.

First, enforcement is challenging. Fishing remains allowed above the Gechiak River, but anglers may not specifically target King salmon. This creates ambiguity: if an angler fishing legally above the Gechiak for Rainbow trout or Chum salmon incidentally catches a King, have they violated the regulation? The rule is open to interpretation and inconsistent enforcement.

Additionally, the mouth of the Pungokepuk River already serves as the practical boundary for outfitters and is the universal stopping and pickup point for all user groups on the river, coinciding with the start of the Togiak National Wildlife Refuge.

Our anecdotal experience indicates that significantly more Kings now spawn above the Pungokepuk than between the Gechiak and Pungokepuk. This aligns with the 2012 U.S. Fish and Wildlife Service study, which found:

- Only 2% of spawning occurred in Gechiak Creek.
- No significant spawning activity was documented between the Gechiak and Pungokepuk Rivers—contrary to claims made at the 2022 BOF meeting.

- The majority of tributary spawners were located well above the Pungokepuk River, primarily in the Nayorurun, Kemuk, and Ongivinuk Rivers (more than 20 miles upstream).
- Tributary-bound Chinook entered the river earlier than mainstem spawners.

We believe these factors support moving the boundary to the Pungokepuk River for clearer enforcement, better resource protection, and consistency with existing river use patterns.

Thank you for your consideration.

### **Proposal 103 - Oppose**

With regard to proposal 103, which is no chumming submitted by royal coachman, their proposal if passed would not accomplish their stated end goal of establishing/maintaining fair chase practices because; The same salmon eggs that are likely being used as chum, can easily be used as bait on a single hook, providing the same level of attraction when the eggs fall off of the hook. As it is currently worded, their proposal would still allow for the use of bait in targeting these species, would not constrain the types or volumes of bait being used, and would provide increased difficulty for enforcement officers who would have to determine whether or not bait falling off of the hook or lure, was then being utilized as chum. The problem appears to be the liberal use of cured salmon roe as an attractant, and not the use of other forms of chum. Without a total bait ban, or a specific ban on salmon roe as bait or chum, this proposal if passed will likely not accomplish their stated goals of those who submitted it

**Proposal 104** - don't know enough about the fishery to make a comment

**Proposal 105** - don't know enough about the fishery to make a comment

December 28, 2025

Board of Fish  
State of Alaska

Madam Chair and Members of the Board,

My name is Clara Torrison. For many years I have been a setnet permit holder on Ekuk Beach in the Nushagak District. I continue to fish the beach and currently crew for our family operation. I am Alaska Native, as are my family and ancestors. We have fished this beach long before the state of Alaska, from the same fish camp. As with many families on this beach, it is far more than a commercial fishery. It is our heritage and connection to the land, waters and abundant resources of Bristol Bay. We want to provide our input on some of the many important topics that you will decide upon, each with its implications to our family.

I submit these comments both 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.

- Maintain the Nushagak Chinook Management Plan. I support allowing the Nushagak Chinook Management Plan to work without pre-emptive 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 mid-cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working. This is a good plan that was developed with a good, public process – we need to give it time to work.
- Support for Proposal 56: Predictable Spatial Boundaries. I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. This boundary was approved by the Board in 2022 and provides a clear and enforceable line between set and drift operations. It has helped a great deal already to decrease conflict and helped with gear entanglements. Making it permanent provides certainty for setnet placement, drift operations, and enforcement in a high-density fishing area. Not making this permanent would be to reintroduce chaos and all the trouble that would bring.
- Support for Proposal 57: Orderly and Safe Fishing. I support Proposal 57, which establishes that same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This is a much-needed enhancement to Proposal 56, which provides limited protection of vulnerable setnet gear. Our family and everyone else on the beach has suffered significant outer gear damage/loss due to entanglements with drift boats. We even have a term we use when we are approaching our site and see our net (often full of fish) washed up on the shore – "soul crushing". We need a minus 3.0 tide to change out our rope, which is uncommon during the short commercial season. We can literally be taken out by a careless or aggressive drift boat. 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 Setnet Operations. I support Proposal 80, which allows limited joint-venture setnet 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. There are Native families that are struggling and even exiting the fishery because of the high cost of equipment and crew issues; allowing joint ventures would help these families to share resources. This approach has worked successfully in Kodiak setnet fisheries for decades.
- Economic and Community Impacts of Missed Allocation. In recent years, setnet fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% setnet allocation. These shortfalls 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. For Ekuk beach specifically, we fish with trucks and deliver (in ice slush) to the Alaska Best Seafood plant. We completely depend on this plant. Falling short of the allocation, which impacts every family, is tremendously impactful to the processing plant that needs volume to survive. We all need the allocation to work as the Board intended.

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 Chinook conservation plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce interception, 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. Taken as a whole, these measures help ensure that set-net fishermen in the Nushagak District have a fair 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,



Clara Torrison

  
Chugiak, AK 99567

Ekuk Beach, Nushagak District

December 28, 2025

Board of Fish  
State of Alaska

Madam Chair and Members of the Board,

My name is Luke Torrison. I am a setnet permit holder and fish on Ekuk Beach in the Nushagak District. My mom's (Alaska Native) family has fished this beach long before the state of Alaska, from the same fish camp. As with many families on this beach, it is far more than a commercial fishery. It is our heritage and connection to the land, waters and abundant resources of Bristol Bay. We want to provide our input on some of the many important topics that you will decide upon, each with its implications to our family.

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- Economic and Community Impacts of Missed Allocation. In recent years, setnet fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% setnet allocation. These shortfalls 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. For Ekuk beach specifically, we fish with trucks and deliver (in ice slush) to the Alaska Best Seafood plant. We completely depend on this plant. Falling short of the allocation, which impacts every family, is tremendously impactful to the processing plant that needs volume to survive. We all need the allocation to work as the Board intended.

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

Respectfully,



Luke Torrison

██████████  
Chugiak, AK 99567

Ekuk Beach, Nushagak District

December 28, 2025

Board of Fish  
State of Alaska

Madam Chair and Members of the Board,

My name is Scott Torrison. I am a setnet permit holder and fish on Ekuk Beach in the Nushagak District. My wife's (Alaska Native) family has fished this beach long before the state of Alaska, from the same fish camp. As with many families on this beach, it is far more than a commercial fishery. It is our heritage and connection to the land, waters and abundant resources of Bristol Bay. We want to provide our input on some of the many important topics that you will decide upon, each with its implications to our family.

I submit these comments both 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.

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- Economic and Community Impacts of Missed Allocation. In recent years, setnet fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% setnet allocation. These shortfalls have real consequences for fishing families, local processing, and watershed communities like Ekuik. 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. For Ekuik beach specifically, we fish with trucks and deliver (in ice slush) to the Alaska Best Seafood plant. We completely depend on this plant. Falling short of the allocation, which impacts every family, is tremendously impactful to the processing plant that needs volume to survive. We all need the allocation to work as the Board intended.

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 Chinook conservation plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce interception, 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. Taken as a whole, these measures help ensure that set-net fishermen in the Nushagak District have a fair 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,



Scott Torrison

██████████  
Chugiak, AK 99567

Ekuik Beach, Nushagak District



# UNITED FISHERMEN OF ALASKA

**Mailing Address:** P.O. Box 20229, Juneau AK 99802-0229

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December 29th, 2025

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

**RE: Opposition to Proposals 61, 62, 69, 92, Support for Proposal 80, and General Comments on Proposal 54.**

Dear Chairwoman Carlson-Van Dort,

United Fishermen of Alaska (UFA) is a commercial fisheries trade association representing 37 commercial fishing organizations and independent fishermen who participate in the state and federal fisheries off Alaska. UFA appreciates the opportunity to provide comments on proposals for consideration at the upcoming January 13th-18th Bristol Bay Finfish meeting.

**Proposals 61 and 62:**

UFA Opposes proposals 61 and 62. Proposals 61 and 62 would create significant shifts to the current Nushagak King Salmon Management Plan by removing season start triggers that allow for commercial sockeye harvest before the 28th of June under status quo conditions. Neither proposal takes an approach of adjusting triggers or OEG's, two tools that could be adjusted and still allow in season management to remain flexible and dynamic with shifting returns and escapement data.

The current management plan was developed by a Board-sanctioned collaborative working group during the 2022/23 Board of Fisheries cycle. That working group was able to create a management framework that relies on OEGs and escapement triggers to open and close commercial harvest in the Nushagak District. This management plan has only been used for three seasons, not enough to indicate the full effectiveness as king salmon live on a 4-7 year cycle. This means we will likely not know true effectiveness of the management plan until the next Bristol Bay Finfish cycle in 2029/30. While we do not know the full cycle effectiveness of the plan, the Department has been able to achieve an additional escapement of 6,800-10,500 chinook up the Nushagak in the last three seasons while that plan has been in effect.

Maintaining the current Nushagak King Salmon Management Plan is the best option for the current situation as it has OEGs and escapement triggers in effect that can be modified without needing to

develop a new management plan. Making fine tuning adjustments such as adjusting OEGs or escapement triggers to open the fishery are much more responsive to the year-to-year shifts in fishery returns for both chinook and sockeye.

**Proposal 69:**

UFA Opposes proposal 69 as written. We are very supportive of meaningful management structures to rebuild the Nushagak kings, however, proposal 69 omits flexibility that was originally included in the draft rebuilding plan that was developed in the 2022/23 cycle. Following the recovery plan language that was provided in prop 69 for management provisions based on escapement, there was also language drafted but not adopted in 2023 that would allow for more responsive flexibility to be used by the department based on escapement indices. UFA is supportive of the additional language from 2023 as follows:

- “2. Restrictions - Management restrictions may be relaxed based on king salmon run timing and if catch and harvest data indicate restrictions are no longer needed to ensure the escapement goal is met.  
3. Restrictions - If two consecutive years of escapement are near or above the upper bound of the escapement goal range, management restrictions may be relaxed or set aside using EO authority<sup>1</sup>.”

Both of these additional sections allow for more departmental flexibility and the use of more dynamic management tools than is commonly used in rebuilding plans. We believe this is essential due to the unique nature of managing chinook recovery and a commercial harvest of sockeye in the Nushagak River.

**Proposal 80:**

UFA Supports proposal 80. Proposal 80 provides for limited joint-venture set-net operations of two permits, which would allow two permit holders to share equipment and comingle their catch. Joint ventures help small, family-based sites 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 and positive conversations with ADF&G. The Department is willing to clarify their delivery regulations to account for joint deliveries by either member of the joint venture.

**Proposal 92:**

UFA Opposes proposal 92. Proposal 92 would limit the Department’s ability to manage the commercial fisheries in the Naknek-Kvichak district for late season fishing. The Department currently has EO authority to close the Naknek-Kvichak district if there are indicators of poor escapement. The Naknek-Kvichak District transitions to the fall fishing schedule on August 1st annually to accommodate more late season escapement windows.

**Proposal 54:**

UFA is neutral on Proposal 54 but wants to emphasize that this proposal is not intended to restrict or reduce commercial opportunity for fishermen in the Nushagak District through its implementation. The

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



# UNITED FISHERMEN OF ALASKA

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Department has indicated that harvest data is an adequate tool to responsibly manage species that are data poor and does not expect the adoption of this proposal to limit commercial opportunity in the late season for coho or sockeye salmon in the Nushagak District.

Thank you for your time and attention to these important Bristol Bay finfish issues, and please feel free to reach out if you have questions or would like to follow up on specific proposals.

Regards,

Matt Alward  
President

Tracy Welch  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association  
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve  
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel Owners Assn Groundfish Forum • Kodiak Regional Aquaculture Association •  
Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association  
Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner  
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast Alaska  
Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association  
United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association

**Submitted by:** David Vardy

**Community of Residence:** Stanwood, Washington

Proposal 72 is listed as a "Purse seine operation (1 proposal)" It is actually a gill net operation proposal. I urge the BOF to thoughtfully consider all of the Fishing District Proposals (70-74) and to reach out to their authors to gather the full picture in order to fully understand the reasoning behind these proposed changes.

I Strongly support Proposals 75, 76 & 77. The groundwork has been laid out for this type of proposal for many years and this would not be the first fishery in Alaska that has implemented permit stacking. Proposal 76 appears to be the best written candidate based on proposal language.

I Strongly support Proposals 82, 83 for the purposes of vessel safety and efficiency.

I Strongly support Proposals 87, 88 & 90 for the purposes of vessel safety and efficiency.

I Strongly support Proposal 95 for the purposes of safety and early season equipment testing without having to fully commit a vessel and its operations to a district. This particular proposal could lead to less maritime incidents, injuries and even fatalities.

**Submitted by:** Kodi Vetsch

**Community of Residence:** anchorage

Madam chairmen and members of the board,

My name is Kodi Vetsch, and I am a set-net permit holder fishing on the north beach In the Egegik district. I submit this comment on behalf of my family's small fishing operation consisting of three limited entry permits.

I support proposal 80 which provides limited flexibility for small operations like mine and many others to operate more efficiently in a fishery that presents many challenges. A Joint-venture structure can be extremely beneficial in expediting our product to market while improving salmon quality as well as safety.

Thank you for your consideration,

Kodi Vetsch

North beach, Egegik district

**Submitted by:** Tammy Vetsch

NA

**Community of Residence:** Naches

Madam Chairman and Board members

My name is Tammy Vetsch and I am a set net permit holder on the North Shore of the Egegik district. I am here to support proposal 80 which provides limited flexibility for small operations like mine and many others to operate more efficiently.

Quality of our product and safety for our operation would benefit from this proposal.

Thank you for your consideration,

Tammy Vetsch,

North Beach, Egegik district

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PC256

**Submitted by:** Sam Volk

**Community of Residence:** Anchorage

2025-26 Bristol Bay Finfish Comments

#48. Support. This proposal takes what we have learned from management of the Naknek River Special Harvest Area and applies that knowledge to the new Kvichak River Special Harvest Area. Additionally, it has parts that would benefit both drift and set net fishermen.

#49. Oppose. This does not seem like it would support the gear type allocation goals.

#52. Support. Special Harvest Areas don't have to be used every season, if ever. But more tools at a biologist's disposal is a good thing.

#53. Oppose. We should not be modifying fishing districts to curb illegal fishing activity. We should be appealing for law enforcement (State Troopers) to extend their season. If you change boundary lines, it will just change the location where the illegal fishing is taking place, it will not stop people from "line fishing."

#54. Support.

#59. Support.

#60. Support.

#61. Oppose. This fodder proposal is obviously meant to take away from one user group and benefit another. Commercial fishermen have already borne the brunt of the Nushagak King Salmon management plan. The added language for sport fishermen "Retention of King Salmon may be limited if..." is a cop out as catch and release of King Salmon certainly still negatively affects their migration to the spawning grounds.

#62. Oppose. Again, another proposal aimed to curtail commercial fishing, so non-resident sport fishermen can continue business as normal. Unfair, and poor economics for the state.

#63. Support.

#64. Support.

#67. Support. Ideally, this proposal would help with the harm that catch and release fishing does to migrating King Salmon. It is also just a more sporting way to fish.

#68. Oppose.

#69. Oppose.

#70. Support. Ugashik deserves a level playing field with Egegik.

#75. Oppose. I oppose permit stacking in this fishery. The Bristol Bay drift fishery in particular is largely made up of non-residents with sources of income outside of the Alaska fishing industry. Those people with other (often substantial) sources of income would buy up dual permits, accelerating the outmigration of permits from rural, Alaskan residents.

#76. Oppose. For the same reason as #75.

#77. Cautiously Support. This is an interesting idea to help with fleet reduction (which I agree is necessary) that may not affect the ability for young fishermen to enter the fishery as much.

#78. Oppose. For the same reason as #75.

#82. Support.

#83. Oppose.

#84. Oppose.

#86. Support. Confusing language needs to be rectified so that enforcement can be consistent

#87. Support. Confusing language needs to be rectified so that enforcement can be consistent.

#88. Support.

#92. Oppose. Coho stocks are not currently being assessed, and therefore should not be a management factor. This is based on anecdotal evidence.

#93. Support.

#94. Support.

#95. Support.

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PC257

**Submitted by:** Dagen Walton

**Community of Residence:** Kenai Peninsula

My name is Dagen Walton. I am a permit holder in Bristol Bay and own and operate the boat, F/V Turbo. I have been fishing in Bristol Bay since 1998 and am a 4th generation Bristol Bay commercial fisherman. I am also an owner of a fly fishing lodge in Bristol Bay with my family. I see the sides of this fishery from the commercial fisherman, lodge owner, and fly fishing guide's eyes.

I support proposals 45, 46, 47, 75, 76, 77, 78.

I do not support proposals 61, 62.

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Madam Chair and Members of the Board,

My name is Harmony Wayner. I am a set-net crew member, subsistence user, and part of a sixth-generation Alaska Native fishing family on Naknek Beach in the Naknek–Kvichak District. I also work in fisheries science and management across the federal, academic, and nonprofit sectors. I hold a Bachelor of Science in Biology from the University of Alaska Southeast and a Master of Resource Management in Coastal and Marine Management from the University Centre of the Westfjords in Iceland. I submit this comment as an individual, not representing my employer or any affiliated organization, and as someone whose culture, livelihood, and family depend on a safe, fair, and sustainable Bristol Bay fishery.

### **Support for Proposals 45, 46, and 47**

In recent years, run timing has become less predictable, and we have seen a significant portion of our catch arrive later in the season. In several seasons, July 10–18 has produced the largest harvest of our year. Extending the registration time for the drift fleet to enter the district would allow for more accurate escapement management during these later runs. It would also account for the reality that much of the drift fleet is returning to Naknek-based boatyards toward the end of the season. These proposals provide flexibility without compromising conservation goals.

### **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 shorter openings, rising costs, and safety challenges without expanding fishing footprint or promoting consolidation. It often makes practical and economic sense for a family or small crew to operate multiple sites efficiently, particularly given tidal timing, delivery logistics, and the costs associated with maintaining high-quality fish. This approach has been successfully used in Kodiak set-net fisheries for over four decades and has proven to be both effective and sustainable.

### **Opposition to Proposal 50**

I do not support Proposal 50. While fish quality is important, incorporating quality standards into commercial regulations for sockeye, similar to the herring fishery, does not reflect the realities of salmon set-net operations. Quality is heavily influenced by site-specific factors such as tides and individual operational practices. Quality improvements are best addressed through direct communication between fishermen and processors rather than through state regulation.

### **Opposition to Proposal 92**

I do not support Proposal 92. A fixed deadline of July 25 for the closure of all commercial fisheries would be harmful to local people who depend on later-season fishing. By that date the 25th of July, most of the external (non-local) fleet has already pulled up anyway. Implementing a date-based closure ignores the increasing variability in run timing we have experienced in recent decades. From my experience as a set netter, bycatch of other salmon

species and trout late in the season is very limited. Management should remain responsive to actual run conditions rather than rigid calendar deadlines.

### **Opposition to Proposal 105, 185 and King Salmon Management Measures**

I do not support Proposals 105 or 185 at this time. Before adopting a new Bristol Bay King Salmon Management Plan, particularly one specific to the Naknek River, or implementing significant fishing restrictions, accurate and comprehensive data supported by meaningful enumeration measures are needed. In my experience as a set-netter, king salmon bycatch is limited relative to our harvest, which is approximately 99 percent sockeye, especially during peak sockeye run timing. King salmon also tend to migrate earlier and at greater depths, further reducing interactions with set-net gear later in the season.

Severe restrictions on fishing time would likely result in over escapement of sockeye salmon, creating additional management challenges, reducing overall harvest value, and economic outcomes for our community. Set-net operations also face logistical constraints in deploying and retrieving gear, particularly when compared to the drift fleet's greater mobility and use of hydraulic reels. Implementing restrictions on set-netters without robust monitoring and reliable data would disproportionately impact fishermen, their livelihoods, and the communities that depend on them.

I strongly urge the Board to prioritize improved king salmon monitoring and data collection before imposing additional restrictions on commercial fisheries. I also support the development of a strong, stakeholder-driven process or task force that includes representation from all user groups and managers. Achieving collective buy-in is essential if we are to move forward in a fair and effective manner, one that reduces conflict among user groups and instead focuses on the shared conservation outcomes we all want for the Naknek River and its king salmon.

Respectfully,  
Harmony Wayner

**Submitted by:** Reise Wayner

**Community of Residence:** Naknek Alaska

Hello board of fish,

My name is Reise Wayner, I am a lifelong Alaskan, and have fished Setnet in Bristol bay for 20 years. My family has been fishing in the same spot on the beach for 5 generations.

I am thankful to be able to share my opinions with you and others. My goal is for the Bristol bay fishery to be around far after I am gone.

Oppose - Proposal 49.

I believe that there should an equal split, 1:1, between Setnet openings and drift openings.

With am and pm tides switching every other day. Sometimes the evening tides are better and sometimes am, but in the 3 to one split, we fished at night during the weak tide in 2014. Our season was shot.

Equal fishing opportunities is the point.

Oppose - Proposal 61

Limiting commercial operations post June 28 because of king escapement will further harm the king salmon stock. When sockeye overescape there is less habitat for kings. A healthy harvest of sockeye salmon allow the kings to have more habitat to spawn. The more finns you have, the less space you have.

Support - Proposal 80

Joint - venturing for settnetters is an essential part of working together as a family. Our family has worked together and our two permits represent 4 generations of cooperation. It makes settnetting economical and family oriented. This proposal would make allowable what has been working for generations.

Oppose - Proposal 105

I am not against responsible management, but I am against king escapement dictating sockeye openings.

King salmon run early, count them early, but do not hinder the sockeye fishery as this would also harm the king escapement.

If sockeye overescape there is less room for king salmon to spawn.

Thank you for your consideration of my opinions.

Respectfully,

Reise Wayner.

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**Submitted by:** Marcus Weiner

Fish Alaska magazine

**Community of Residence:** Battle Ground, WA

We support Proposal 102. Allowing the use of bait earlier will allow more sport fishermen to catch sockeye without lining them. This is better for the sockeye fishery. Since most kings spawn above the Pongo, it also makes sense to allow sport anglers to fish for kings up river as far as the Pongo.

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**Submitted by:** Christopher Widing

**Community of Residence:** Washington

As a Bristol Bay commercial fisherman of 18 years i feel that everyone who participates in this fishery should be heard, and everyones voice should count considering it effects us all not just watershed residents. My issue with proposal 45 is it specifically targets one specific district without addressing issues that could be present in other districts. a better solution might be to allow an extension only if escapement has not been reached. The issue i have specifically with proposal 49 is it does nothing to address how the allocations to gear sets would be caught. If there are only 200 boats fishing the krsha than how do they expect the allocation to stay at a approx 80/20 percent split if it goes one drift to one set opener. my issue with proposal 50 stems from trying to use the ADF&G to do what markets should truly be doing and pushing for better quality in there own ways with incentive, not making it a legal issue for poor quality. It also seems something very hard to enforce and to what end? My issue with proposal 52 is that it seems to be trying to stop overescapement in a poor way, the better use of this would be to allow for longer fishing periods on one tide a day which would allow for better management. My issue with proposal 61 is it seems to do detrimental harm to the commercial fleet by basing something on a specific date for something that can have a huge swing year to year. Proposal 63 seems to state one thing than propose an entirely different idea. It states that larger fish are more vital to breeding stocks than suggests that a limit on them be entirely removed and no closures which goes against the very thing it states. Proposals 71-74 are showing the overwhelming support for allowing a general district to allow fisherman to continue to fish. the amount of illegal activity at the district lines has gotten out of hand in recent years and seems to benefit a very small group who "bully" many of the rest of the fleet into quitting for the season due to chance of either catching nothing or possibly getting caught fishing out of district. Changing to a general district would benefit many greatly at only the cost to those who were fishing illegally in the first place. The only downside would be reporting numbers, but by this point in the season the counting towers are wrapping up and a lot of the data becomes generalized anyways. Proposal 88 brings up a good point of the issue with anchor rollers. why that seems to be a necessary thing that is defined past the 32' seems unnecessary. the problem comes down to current anchor design which requires a longer anchor roller design in order to not do damage to the bow of the vessel. The spirit of the regulation needs revisiting in order to correctly correlate with the current state of vessels and anchor requirements and needs to also take safety of anchor equipment and retrieval of said anchor onboard. Proposal 89 seems to just take a different stand on the same issue and seems to be a good middle ground.

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**Submitted by:** Nolan Willis

**Community of Residence:** Eagle River, AK

My name is Nolan Willis. I am a current resident of Eagle River, Alaska, and a former resident of Bristol Bay (Naknek and Dillingham). I hold a Bristol Bay permit and have been fishing in the region for nearly three decades, mostly in the Nushagak District. Most of that time has been spent on the F/V Red Zone, though I have also operated the Rip Runner and the Sabotage. Over the years, I have witnessed both the rises and declines of the sockeye fishery, as well as the ongoing long-term decline of Chinook salmon. I have reviewed the BBSRI performance assessment of the current management plan and the related recommendations from ADF&G biologist Tim Sands (Nushagak River Chinook Salmon Stock Status, 2023–2025).

There are two critical considerations in Chinook conservation:

- The reality of Chinook escapement goals.
- The reality of managing the sockeye fishery.

We cannot simultaneously meet the current Chinook escapement goals and manage the sockeye fishery effectively. If the wrong balance is struck, we risk damaging the sockeye fishery while achieving minimal benefit for Chinook.

Tim Sands' report makes clear that Nushagak Chinook are not biologically endangered but are experiencing a long-term decline consistent with statewide trends. In several recent years, even with zero Chinook harvest, the stock could not have met the 95,000-fish in-river goal, which was set during a period of higher productivity. Recent escapement has hovered near the lower bound of the sustainable escapement goal (55,000 fish), once assessment uncertainty is considered. For this reason, the department recommends using the lower bound of the SEG as the metric for removing the stock from "management concern" status and suggests the Board revisit whether the current in-river goal remains appropriate under today's productivity conditions.

The Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan highlights several important points. Developed over five years (2018–2023) through a stakeholder-driven process involving biologists and representatives from commercial, sport, and subsistence fisheries, the plan has functioned as intended in its first three years. It has delayed openings, reduced fishing time, and allowed more Chinook and sockeye to pass upriver before harvest exposure. However, Chinook escapement goals have not yet been met due to continued low production. Because Chinook lifecycles span 4–7 years, three seasons of implementation are insufficient to evaluate long-term outcomes. The plan must remain in effect for several more years to assess its effectiveness. Importantly, the plan does not sacrifice the health of the sockeye fishery; its triggers allow commercial sockeye fishing to begin before June 28 when escapement goals for the Nushagak and Wood Rivers are met.

By contrast, proposals 61 and 62 undermine the goals of the current management plan. They attempt to codify a June 28 start date and restrict fishing time until July 4, eliminating flexibility to adjust based on sockeye escapement. This is problematic because the sockeye run typically escalates rapidly in late June and peaks in early July. Rigid restrictions risk over-escapement in the Nushagak and Wood Rivers by millions of fish—far beyond what those systems can biologically support—while reducing harvest opportunities and inflicting significant economic harm on commercial fishermen.

Proposals 63–68 are less severe, either because they do not directly impact the sockeye fishery or because they seek to ease frustrations with the current plan—for example, by permitting fishing in the Wood River before escapement triggers are met or by adjusting metrics without codifying fixed fishing times into law. Even so, these proposals remain premature. The management plan has not been in place long enough to evaluate its effectiveness, and any adjustments should be deferred until more data is available.

Proposal 44 raises practical concerns. It would impose a fixed numerical limit on home-pack Chinook for both commercial and sport users. For commercial fishermen, however, this restriction would not reduce harvest. Any Chinook caught incidentally in sockeye gear must already be retained and either delivered or consumed, and only a small number are ever kept as true home pack—often cooked and eaten onboard early in the season. Limiting home pack therefore adds regulatory burden without producing conservation benefit. Commercial and sport fisheries operate under fundamentally different conditions, and applying a uniform limit across both sectors ignores those differences. Proposal 44 does not advance Chinook conservation and instead creates unnecessary regulation without measurable biological gain.

In summary: Chinook productivity is down for reasons not yet fully understood. The best available data does not implicate commercial fishermen, as Chinook are failing to return in sufficient numbers regardless of harvest activity. In my experience, we rarely catch more than a handful of Chinook during any opener, and often none at all. No current conservation proposal will meaningfully restore Chinook numbers to historic baselines, and at least two proposals (61 & 62) would harm the sockeye fishery for negligible Chinook gains. The remaining proposals are premature, misguided, or politically motivated. The most prudent course is to allow the current management plan to run its course and reassess beginning with the 2027 salmon season. If Chinook returns improve between 2027 and 2030, we will have a clearer picture of the plan's effectiveness.

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December 27, 2025

To The Alaska State Board of Fisheries Members:

My name is Victor Willis and currently reside in Eagle River, Alaska. I have spent most of my life as a resident of Bristol Bay (residing in Egegik, Naknek and Dillingham). I currently hold a Bristol Bay drift permit and have been fishing in the Bristol Bay region since 1968. Most of my fishing tenure has been in the Nushagak District on the F/V Red Zone.

Over the past five decades, I've witnessed significant changes in the Bristol Bay fishery, including the migration from manually operated wooden skiffs and double-ender-conversions to modern aluminum and fiberglass, technically advanced fishing vessels. Along with these equipment changes and district management strategies with sustainability at the forefront, fisheries management plans have become much more sophisticated, affecting both gear types including the institution of salmon allocations between those gear types. Probably the most profound change has been the downturn of the King Salmon run over the past three decades. Evidence indicates this is not solely a Nushagak District issue but has been confirmed to be a state-wide problem. As a result, fishermen went from participating in commercial King Salmon openings in the 1970s, 80s and 90s to commercial King Salmon fishing closures altogether over the past twenty-five or so years because of the significant King Salmon stock decline.

In light of the current Bristol Bay fishery proposals under consideration, I reviewed the following reports:

- 1) The Bristol Bay Science & Research Institute (BBSRI) Stock Of Concern (SOC) Management Plan adopted by the Board Of Fish (BOF) in March of 2023.
- 2) The performance of the SOC Management Plan over the past three seasons (2023--2025).
- 3) The assessment of the current SOC Management Plan.

The assessment of the SOC Management Plan includes the four key findings below:

- 1) The SOC Management Plan consistently delayed the start of the commercial fishing season by 2–5 days compared with the previous management structure.
- 2) Delayed openings resulting from the new commercial start triggers allowed an additional 6,500–10,800 king salmon to pass through the district before exposure to harvest annually.
- 3) The Optimal Escapement Goals (OEGs) enabled longer in-season closure windows, reducing harvest pressure and allowing more king salmon to migrate upriver.
- 4) Combined, the start triggers and OEG-driven fishing breaks resulted in an average reduction of roughly 240 commercial fishing hours per year, prior to July 5th—about a 42% decrease in commercial fishing time from the previous management structure.

With the foregoing in mind, I strongly oppose Proposals 44 and 61 through 68 inclusively for the reasons stated below:

- 1) While there is a state-wide downturn in King Salmon populations, I would not characterize the Nushagak King Salmon run as endangered. Rather, most—if not all—Alaska river systems are experiencing a long-term decline consistent with statewide trends. Hence, the reduced population of King Salmon returning to the Nushagak River can no longer support a required minimum in-river escapement goal of 95,000 Kings, as achieved a few decades ago with much healthier King Salmon runs occurring at that time. Consequently, in the interim, the escapement goal of 95,000 Kings needs to be adjusted downward to a realistic number to reflect the overall decline of the King Salmon populations while new strategies to mitigate the declining King Salmon fishery are developed.
- 2) Attempting to achieve an in-river goal of 95,000 Kings during plummeting King Salmon populations by closing the Sockeye Salmon fishery longer will not guarantee the restoration of the King Salmon runs. Fundamentally, the cause(s) of this downturn have not been accurately and completely identified. Many theories have been discussed without any definitive evidence or specific causes. Attempting to achieve an in-river escapement goal of 95,000 King Salmon in the Nushagak River at the expense of the Sockeye Salmon fishery—through continued reductions in fishing time—will only guarantee a significant loss of revenue for fishers. At the same time, it risks the collapse of Sockeye Salmon runs due to inevitable over-escapement.
- 3) Recent King Salmon escapement has hovered near and slightly below the lower bound of the Sustainable Escapement Goal (SEG) of 55,000 kings over the last several years. For this reason, the Alaska Department of Fish & Game recommends using the lower bound of the SEG as the metric for removing the stock from “management concern” status and suggests the Board of Fish revisit whether the current in-river goal of 95,000 Kings remains the appropriate number under today’s productivity conditions.
- 4) The Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan highlights several important points. Developed over five years (2018–2023) through a stakeholder-driven process involving biologists and representatives from commercial, sport, and subsistence fisheries, the plan has functioned as intended in its first three years. It has delayed openings, reduced fishing time, and allowed more King Salmon and Sockeye Salmon to pass upriver before commercial harvesting. Unfortunately, King Salmon escapement goals have STILL not yet been achieved because of continued low returns. Since King Salmon lifecycles span 4–7 years, just three seasons of implementation and data collection are insufficient to evaluate long-term outcomes. Therefore, the current SOC Management Plan must remain in effect for several more years to accurately assess its effectiveness. **Most** Importantly, the existing SOC Management Plan does not sacrifice the health of the Sockeye Salmon fishery by risking severe over-escapement. To avoid Sockeye Salmon over-escapement this Plan has built-in triggers that allow commercial Sockeye Salmon fishing to begin well before June 28, only after escapement triggers for both the Nushagak and Wood Rivers are met. Simply put, we need to follow the existing SOC Management Plan to its final intended conclusion.
- 5) Until the actual causes of the statewide decline in King Salmon runs are identified, imposing drastic measures on river systems would be imprudent. Such actions could do more harm than good—particularly by jeopardizing Sockeye Salmon runs in the effort to

improve King Salmon numbers. Because the reasons for the continued decline in King Salmon runs remain unclear, investigating all possible contributing factors is essential. Efforts should avoid defaulting to simple explanations—such as blaming climate change or Bristol Bay fishermen—while overlooking other potential causes that may be less convenient to address. To date, there are lingering questions concerning the impact of high-seas bycatch from other fishery groups, namely trawlers, and we are not satisfied with any policy that ignores their potential impacts while threatening our fishery.

- 6) **Proposal 44** would do very little to mitigate the existing low King Salmon runs and would result in an administrative/regulatory nightmare with low propensity for enforcement for all sport, subsistence, and commercial fishing groups. For commercial fishing groups, this restriction would not reduce harvest because any incidental King Salmon caught in commercial Sockeye Salmon gear must be retained for subsistence or delivered/sold to the fish company's tender. Currently, most incidental King Salmon catch is sold. Since commercial and sport fishers operate under different regulations and conditions, the application of a uniform daily catch limit for both user groups ignores those differences. Ultimately, Proposal 44 does not advance King Salmon conservation but instead creates unnecessary and onerous regulations that would likely be unenforceable while not creating any biological improvement. Moreover, the nature and tone of Proposal 44 appears to be politically motivated.
- 7) **Proposals 61 and 62** undermine the goals of the current SOC Management Plan. They attempt to codify a June 28 commercial fishing start date and additionally restrict fishing time until July 4, eliminating the fishery manager's flexibility to adjust commercial openings based on Sockeye Salmon escapement. This is problematic because the Sockeye Salmon run typically escalates rapidly in late June and peaks in early July. Fishery management restrictions this drastic will inevitably risk severe over-escapement in both the Nushagak and Wood Rivers by millions of fish while significantly reducing harvest opportunities and inflicting economic harm on commercial fishermen and the local communities.
- 8) **Proposals 63, 64, 65, 66, 67 and 68** are less severe and potentially less devastating than Proposals 61 and 62 because they do not directly impact the Sockeye Salmon fishery and appear to mitigate frustrations with the current plan by maximizing harvest opportunities in the Wood River Special Harvest Area (WRSHA) without codifying fixed fishing times into law. Nonetheless, Proposals 63 through 68 are premature since the existing SOC Management Plan for Nushagak King Salmon has not been in place long enough to evaluate its effectiveness, and any adjustments should be deferred until more data is available.

In summary, King Salmon run declines are a state-wide problem, and the cause(s) are not fully understood at this time. The data collected in Bristol Bay for the Nushagak District does not implicate the commercial fishing fleet as the reason for the decline. Notably, King Salmon populations are declining in most river systems all over Alaska, regardless of commercial harvest activity, yet the proposals described above seem to come from an assumption that commercial fishermen are to blame for the decline and should be throttled back to less fishing time accordingly. During commercial fishing over the past decade, I seldom caught more than a handful of tiny "Jack" kings during any opener and mostly caught none. None of the current proposals going before the Fish Board in 2026 will meaningfully restore King Salmon numbers to historic baselines, and at least two of the proposals could devastate the Sockeye Salmon fishery within a few seasons by over-escaping the supporting river systems.

With the foregoing in mind, I strongly oppose Proposal 44 and Proposals 61 through 68 inclusively. If we want to restore King Salmon runs to historic norms, we need to dedicate efforts and resources toward understanding the fundamental reason(s) why King Salmon runs are declining. We fishermen are as concerned about this as anyone, but we are deeply troubled by the lack of scientific answers, the lack of due diligence to get scientific answers, and the ever-present tendency to regulate our Sockeye Salmon fishery to adverse degrees in the absence of scientific answers.

Thank you for your consideration,

Sincerely,

A handwritten signature in cursive script that reads "Victor Willis".

Victor Willis

Owner/Operator F/V Red Zone

**Submitted by:** Adam Wilson

**Community of Residence:** Bellingham, Washington

Delaying Nushagak drift gillnet commercial fishing opens risks excessive sockeye escapement, which can negatively impact the long-term health of the run through density-dependent effects on spawning and rearing habitat. Conservation responsibility should not fall disproportionately on the commercial gillnet fleet, particularly when over-escapement poses its own biological risks. Before implementing drastic restrictions on commercial fisheries, managers should also address impacts from other user groups. This includes evaluating unlimited catch-and-release practices, bag limits, and cumulative environmental impacts from sport fishing pressure on spawning streams. A balanced, ecosystem-based approach to conservation requires shared responsibility across all fisheries targeting the resource.

**Submitted by:** Jake Wilson

**Community of Residence:** Naknek

Proposal 92 is completely out of line and not based on any hard data. Observations from a couple of guys “double dipping” by simultaneously participating in both commercial and sport fishing operations should not hold any weight when regulation changes are being considered. The vast majority of the Naknek commercial gillnet fleet still fishing after July 25th is comprised of local watershed residents who don’t own high end guide businesses to help supplement their income.

Also, there has been a major shift in the gear size being used by the commercial fleet in recent years. Most of the web in the water these days is sub 5” which is obviously not ideal for catching larger bodied silver salmon. I commercially fish the Naknek/Kvichak district into August most years and I can count the number of silvers I catch each season on two hands. I would venture to say that the impact the commercial sockeye fishery has on the silver salmon stocks is minor if not completely negligible.

On top of all that, the uptick in the number of guide operations and lodges on the Naknek in recent years is staggering. I’m a local hobbyist sport fisherman myself and the increase in pressure put on the fish by these outfits is obvious. If any regulation changes need to be implemented, they should be aimed at shortened seasons, decreases in bag limits, and gear restrictions for non resident guides and clients, not taking away economic opportunities for local people.

**Submitted by:** Joseph Wilson

**Community of Residence:** out of state

**Subject:** Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Joseph Wilson. 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,

Joe Wilson

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PC267

**Submitted by:** Kevin Wilson

**Community of Residence:** Tacoma, WA

Dear Members of the Alaska Board of Fisheries,

My name is Kevin Wilson, I am a drift gillnet fisherman, vessel and permit owner in Bristol Bay and I am submitting written testimony regarding the following proposals.

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

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.

I also believe that the Board should consider the proposals for an open district after each river system achieves its escapement goals. The inability of the state to provide enforcement after mid-July creates a system that heavily rewards illegal fishing. If the boundary cannot be enforced than it should be opened. I support proposals 71 and 72.

Sincerely,

Kevin Wilson

F/V Miss Malerie

**PC268**

**Submitted by:** Grant Wooldridge

Wooldridge Boats

**Community of Residence:** Washington

Per proposal 102

1. Allow bait on the Togiak July 11 instead of July 16 (5 days earlier)
2. Move the upper boundary for targeting king salmon from the Geciak River to the Pongo River

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**PC269**

**Submitted by:** Holly Wysocki

**Community of Residence:** Dillingham

I'm writing to oppose Proposals 44, 61-68 commercial fishing is the only way I could afford to live in Dillingham. Please do not approve this proposal we need to fish to make a living.

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**PC270**

**Submitted by:** Mallory Zharoff

**Community of Residence:** King Salmon

I am in opposition to proposal 52. I am a set net fisherman in Egegik for over 20 years and I do not agree with the proposal 52. This will give unfair advantage to a select few fishermen within the boundary they have given.

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